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IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF INDIANA

NOV 30 2022

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INDIANAPOLIS, INDIANA

THE EXCELLENT THE EXCELLENT
RAJ K. PATEL, from all capacities,

Plaintiff

v.

JANE DOE and JOHN DOE

Defendant

Filing Bar No. 1:22-mc-24-TWP

No. _____

Dated: November 27, 2022

**MOTION FOR LEAVE TO INITIATE COMPLAINT AND PROCEED WITHOUT
PREPAYING FILING FEES**

I, T.E., T.E Raj K. Patel (*pro se*), respectfully move the Chief Judge Tanya Walt Pratt of this United States District Court for the Southern District of Indiana to allow me to initiate the attached new civil action against Jane Doe. The complaint is on federal question. Like previous filings, I am suing to find my batterer and those who have violated constitutional privileges and immunities. U.S. const. art. IV, §§ 1-2 & amend. XIV, § 1, cl. 2.

According to my legal research, a John or Jane Doe complaint allows the plaintiff to file a complaint and permits the court and/or the executive branch to find the lawfully liable person(s) for the claims alleges. *See* Ex. A (*Jenkins v. Doe et al.*, No. 22VECV01314 (Cal. Super. Ct., Los Angeles Cnty. 202_)). Based on my previous allegation, the local F.B.I. Headquarters in Indianapolis has actual knowledge of the batterer, whether or not she is an agent of another person. *See* Compl. paras. LVI & LVIII. This complaint is different from those filed against the United States, who via contract has taken responsibility for the actions, but, for now, since several courts disagree with my charge, I must use this method of complex civil litigation in severing the case. This complaint

does not waive claims against the United States, especially for the Tucker Act claims, or new ones which might be discovered per this new complaint.

Given my financial circumstance, I must move for permission to file without pre-paying filing fees, especially since this filing was printed and hand delivered by FedEx.

Therefore, I move this Court to allow me to initiate a complaint without pre-paying filing fees.

In the alternative, I move this Court to allow me to initiate a complaint but permit to submit the appropriate filing fee.

In the alternative, I move this this court to re-characterize this complaint as a motion for judicial review and issue the appropriate relief.

Respectfully submitted,

/s/ Raj K. Patel
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present)
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Corp./President, Brownsburg High Sch. Student Gov't
2009-2010 (corporate sovereign 2009-present)
Rep. from the Notre Dame L. Sch. Student B. Ass'n to the Ind.
St. B. Ass'n 2017
Deputy Regional Director, Young Democrats of Am.-High
Sch. Caucus 2008-2009
Co-Founder & Vice Chair, Ind. High Sch. Democrats 2009-
2010
Vice President of Fin. (Indep.), Oxford C. Republicans of
Emory U., Inc. 2011-2012

electronically FILED by Superior Court of California, County of Los Angeles on 09/08/2022 08:00 AM Sherri R. Carter, Executive Officer/Clerk of Court, by A. Salcedo, Deputy Clerk

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 a/k/a DIANA JENKINS

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

SANELA JENKINS a/k/a DIANA JENKINS,
 an individual,

Plaintiff,

v.

JOHN DOE, ROES 1 through 50, inclusive,

Defendant.

Case No.

COMPLAINT FOR:

**1. INVASION OF PRIVACY BY FALSE
 LIGHT**

DEMAND FOR JURY TRIAL

1 PLAINTIFF SANELA JENKINS a/k/a DIANA JENKINS (“Ms. Jenkins” or “Plaintiff”), for her
2 Complaint against DEFENDANT JOHN DOE, ROES 1 through 50 (“Defendant”) alleges as follows:

3 **NATURE OF THIS ACTION**

4 1. Bad people do bad things. It is wrong to send racist and bullying messages to a fourteen-
5 year-old boy. It is wrong to deceive the public into believing an innocent woman is responsible for sending
6 those messages. And it is wrong to mastermind this hateful campaign in anonymity. This action seeks to
7 unmask and hold accountable the morally bankrupt person who has attacked a child and placed blame for
8 his/her actions on Ms. Jenkins.

9 2. Ms. Jenkins is a current cast member of *The Real Housewives of Beverly Hills*, a reality-
10 based television show chronicling the lives of several women who live in or near Beverly Hills, California.
11 Garcelle Beauvais is another cast member on the show, and one of the storylines covered during this
12 current season has been “heated” exchanges between Ms. Jenkins and Ms. Beauvais, which at times have
13 spilled out onto social media. Their confrontations, however, have remained professional and respectful.
14 Ms. Jenkins has always respected her co-star. Two weeks ago, however, Defendant seized on these
15 confrontations to launch an ugly and hateful campaign against Ms. Jenkins and an innocent child.

16 3. Two weeks ago, Defendant used “bots” to post racist and threatening messages targeting
17 Ms. Beauvais’ fourteen-year-old son. “Bots” are computer programs that use artificial intelligence to post
18 messages under fictitious names. Someone who posts racist and threatening messages to a fourteen-year-
19 old is morally bankrupt. But, Defendant was not content with attacking an innocent child. Defendant
20 ensured that the profile and content of the postings would lead people to conclude that Ms. Jenkins was
21 the one who had purchased the bots used in the attack. That conduct too is in the realm of the morally
22 bankrupt.

23 4. The result of Defendant’s coordinated campaign was predictable and swift. Ms. Beauvais’
24 son endured an emotional turmoil that no one should experience. Ms. Jenkins and her family have as well.
25 Dozens, if not hundreds, of people have posted messages attacking Ms. Jenkins for an act that she never
26 took. Ms. Jenkins’ reputation has been irreparably harmed by post after post accusing her of being the
27 type of person who would purchase bots to harass a child. Ms. Jenkins and her family have been verbally
28 attacked, threatened, and harassed as a result of Defendant’s actions.

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1 concert with, the other Defendants in committing the acts and omissions described herein. Each Defendant
2 is responsible for his/her own actions and the actions of the other Defendants.

3 JURISDICTION AND VENUE

4 12. This Court has personal jurisdiction over Defendant because the causes of action herein
5 arise, in full or in part, from activities and injuries committed by Defendant that are purposefully directed
6 towards and/or within the State of California.

7 13. This Court has subject matter jurisdiction over this dispute. The amount in controversy,
8 exclusive of interest and costs, exceeds \$25,000. The activities at issue were directed at persons within
9 Los Angeles County, California, and Ms. Jenkins was injured in Los Angeles County, California.

10 14. Venue is proper in this Court under section 395(a) of the California *Code of Civil*
11 *Procedure* because the activities and injury was directed towards and/or occurred in Los Angeles County,
12 California.

13 FACTUAL ALLEGATIONS

14 15. *The Real Housewives of Beverly Hills* is one of the highest rated programs on Bravo (the
15 “Show”). Launched in 2010, each season of the Show chronicles the actions and interactions of
16 professional women in Beverly Hills, California. The women featured on the Show range from
17 philanthropists to business professionals to actresses. Many episodes of the Show include “heated”
18 exchanges between the cast members on topics as varied as their background—some important and some
19 otherwise.

20 16. The Show is currently on its 12th season and is featuring 10 women who live in or near
21 Beverly Hills. Ms. Jenkins is one of the cast members. Ms. Jenkins first appeared on the Show in 2021
22 (Season 12). As a cast member, Ms. Jenkins has appeared in episodes featuring her and other cast members
23 trying to balance their ever-evolving friendships with the demands of family life and growing business
24 ventures.

25 17. Garcelle Beauvais is another cast member of the current season of the Show. Ms. Beauvais
26 is an actress known for numerous successful television and major film roles including *The Jamie Foxx*
27 *Show*, *NYPD Blue*, *Coming to America*, and *Spider-Man: Homecoming*. She is also an author, producer
28 and philanthropist. Ms. Beauvais, who is black, has three children, including a fourteen-year-old son. That

1 son has a white father and is therefore bi-racial.

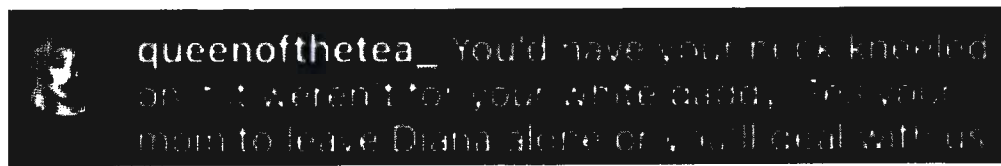
2 18. Episodes of the current season of the Show have featured confrontations between the
3 various cast members, including confrontations between Ms. Jenkins and Ms. Beauvais. However, as for
4 Ms. Jenkins and Ms. Beauvais, there are lines they have not crossed during these exchanges. Ms. Jenkins
5 respects Ms. Beauvais and her family. Ms. Jenkins has not, and would not, cross from entertainment to
6 racially charged attacks.

7 **A. The Harassing and Threatening Comments Directed at Ms. Beauvais' Son.**

8 19. Defendant decided to use social media to manufacture a racist and hateful campaign that
9 would appear to be an escalation of the confrontations between Ms. Jenkins and Ms. Beauvais. There can
10 be no doubt that Defendant created and executed this campaign intentionally and willfully for the purpose
11 of harming Ms. Jenkins, Ms. Beauvais, and Ms. Beauvais' son. The first step in Defendant's campaign
12 was to post messages using social media bots to attack Ms. Beauvais' fourteen-year-old son.¹

13 20. On or about August 22, 2022, Defendant, on information and belief, began directing a
14 series of harassing and threatening comments to the son's Instagram account through social media account
15 bots. The following is a sample of the messages Defendant posted using bots:

- 16 a. User "queenofthetea_" stating: "You'd have your neck kneeled on if it weren't for
17 your white daddy. Tell your mom to leave Diana alone or you'll deal with us." A
18 screenshot of the comment is below:

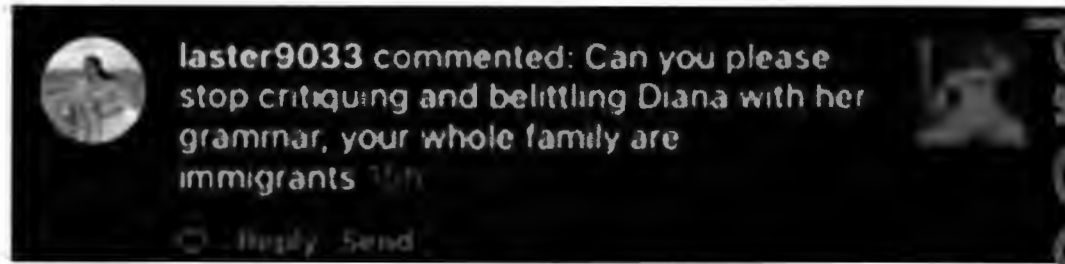


- 20
21
22 b. User "xenir83525" stating: "You called Diana uneducated but you did not even
23 finished [sic] high school Garcelle." A screenshot of the comment is below:
24

25
26 ¹ The Department of Homeland Security defines social media bots as "programs that vary in size depending on their function,
27 capability, and design; and can be used on social media platforms to do various useful and malicious tasks while simulating
28 legitimate users posting content." Dep't of Homeland Security, Social Media Bots Overview (May 2018), available at
https://nics.cisa.gov/sites/default/files/documents/pdf/ncsam_socialmediabotsoverview_508.pdf?trackDocs=ncsam_socialmediabotsoverview_508.pdf.



- c. User "laster9033" stating: "Can you please stop critiquing and belittling Diana with her grammar, your whole family are immigrants." A screenshot of the comment is below:



- d. User "kristina.cardiel" stating: "GARCELLE STOP USING ERIKA, LISA DIANA, KYLE, DORIT FOR YOUR FREE PUBLICITY." A screenshot of the comment is below:

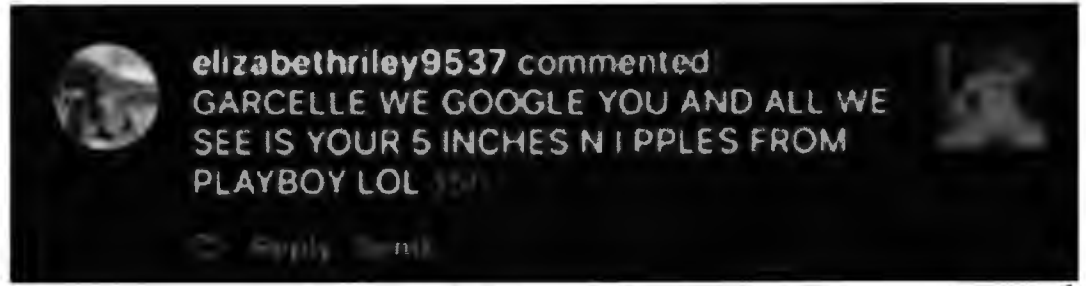


- e. User "shelley.braddock" stating: "TEAM ERIKA TEAM DIANA TEAM LISA TEAM KYLE TEAM DORIT [sic]." A screenshot of the comment is below:

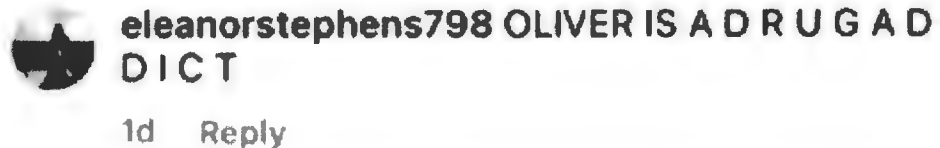


- f. User "elizabethriley9537" stating: "GARCELLE WE GOOGLE YOU AND ALL WE SEE IS YOUR 5 INCHES N I PPLES [sic] FROM PLAYBOY LOL." A

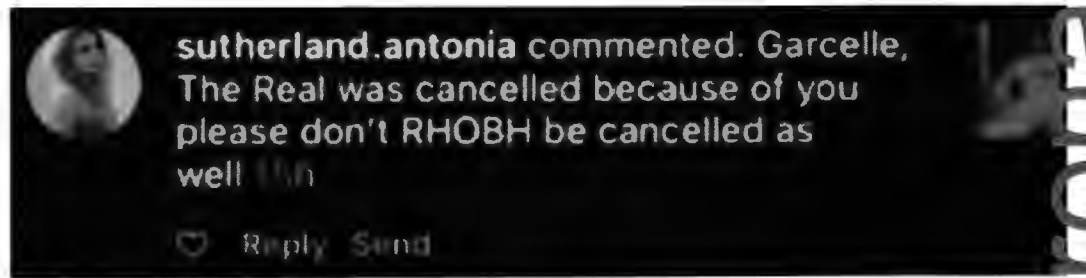
screenshot of the comment is below:



- g. User "eleanorstephens798" stating: "OLIVER [another one of Ms. Beauvais' sons] IS A D R U G A D D I C T [sic]." A screenshot of the comment is below:



- h. User "sutherland.antonina" stating: "Garcelle, The Real [a talk show that Ms. Beauvais co-hosted] was cancelled because of you please don't RHOBH [Real Housewives of Beverly Hills] [sic] be cancelled as well." A screenshot of the comment is below:



- i. User "cindyherrera323," stating: "TELL YOUR MOM TO Leave [sic] Erika ALONE." A screenshot of the comment is below:



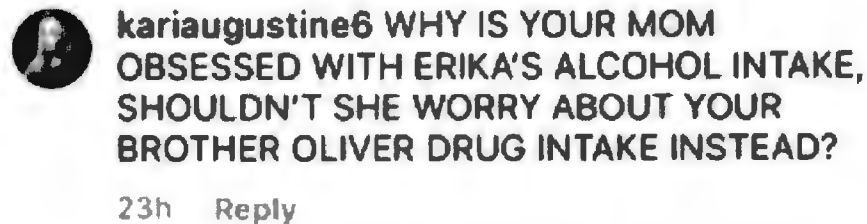
- j. User "ebonyharkey," stating: "Leave Erika And [sic] LISA alone! Your mom is a D-list actress who was getting any booking so she had to join a reality show. Tell her to pipe down." A screenshot of the comment is below:



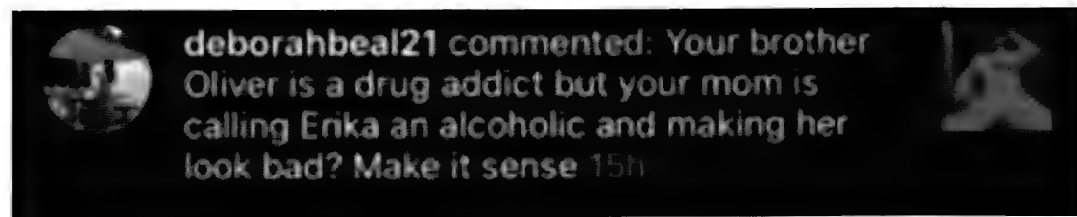
- k. User "margaretcole8113," stating: "Garcelle how about your micro aggression towards Crystal?" A screenshot of the comment is below:



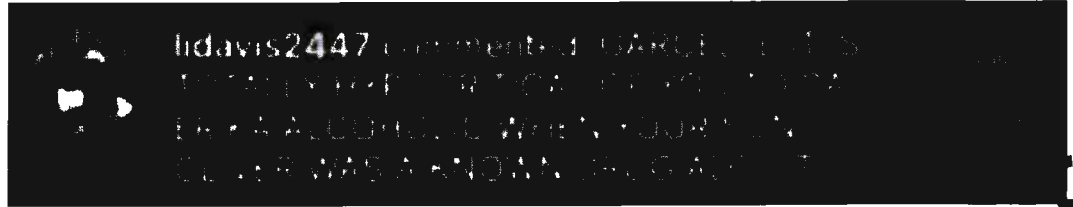
- l. User "kariaugustine6," stating: "WHY IS YOUR MOM OBSESSED WITH ERIKA'S ALCOHOL INTAKE, SHOULDN'T SHE WORRY ABOUT YOUR BROTHER OLIVER DRUG INTAKE INSTEAD?" A screenshot of the comment is below:



- m. User "deborahbeal21," stating: "Your brother Oliver is a drug addict but your mom is calling Erika an alcoholic and making her look bad? Make it [sic] sense." A screenshot of the comment is below:



n. User “lidavis2447,” stating: “GARCELLE IT IS TOTALLY HYPOCRITICAL OF YOU TO CALL ERIKA ALCOHOLIC WHEN YOUR SON OLIVER WAS A KNOWN DRUG ADDICT.” A screenshot of the comment is below:



21. These are messages that Defendant intentionally delivered to a fourteen-year-old boy about him, his mother and his family. They are despicable messages. While Defendant had full knowledge that Ms. Jenkins had absolutely nothing to do with these messages being sent to Ms. Beauvais’ fourteen-year-old son or anyone else, Defendant delivered the messages intending that they would be falsely attributed to Ms. Jenkins for the purpose of harming Ms. Jenkins’ reputation.

22. Ms. Beauvais was understandably appalled that her son would receive these types of messages. Her decision to be on the Show was not authorization for anyone to send these types of messages to her family. On August 23, Ms. Beauvais posted on her Instagram page:

I’m usually a very strong woman[.] I’ve been raised to be strong[.] [M]y life has taught me to be strong, but when it comes to my kids! It hurts[.] [I]t’s not OK[.] I’ve been in tears all night[.] [I]t’s just a TV show people[,] scream at your TV[,] throw something at your TV but leave our kids alone.²

23. Ms. Beauvais also posted on her Instagram page a statement from her son that stated in part: “[M]iddle aged women spamming me with racist and crude comments about my family is not what I expected for my first week of high school.” Ms. Beauvais and her fourteen-year-old son did nothing, and nothing could be done, to justify these types of messages being sent. Defendant’s actions are inexcusable.

B. Internet Sleuths Immediately Discover that the Harassing and Threatening Comments Almost Certainly Came From Social Media Bots, and Not Real People.

24. The second step of Defendant’s scheme was for people to conclude that the racist and

² Available at <https://www.instagram.com/p/Chm71m7JJ32/?hl=en> (last visited Sept. 7, 2022).

1 hateful messages being sent to Ms. Beauvais' fourteen-year-old son were being done by bots. Ms. Jenkins
 2 could not be ensnared in Defendant's heinous scheme if people could not ultimately conclude (falsely)
 3 that she was behind the messages. Because Ms. Jenkins did not post the messages, that meant people
 4 would need to conclude that the messages were posted by bots controlled by Ms. Jenkins or someone
 5 associated with Ms. Jenkins. That is exactly what happened.

6 25. On August 23, 2022, the same day Ms. Beauvais posted on Instagram regarding the
 7 harassing comments her son received, Twitter user "@Ohchadwick" posted: "I ran quite a few of these
 8 accounts [who posted the comments described in Paragraph 20] through BeenVerified and they're all bots.
 9 No traceable online history."³ He later added: "These aren't real people at all. I ran the searches because
 10 I was hoping to find other accounts they were linked to."⁴ "@Ohchadwick['s]" original tweet was then
 11 retweeted over 200 times and received nearly 1,500 likes and 42 quote tweet comments.

12 26. Similarly, on August 24, 2022, Sarah Galli at the *Daily Beast* wrote an article titled: "Why
 13 Is a Real Housewives Fan Army Sending Racist Death Threats to Garcelle Beauvais' Son?"⁵ In the article,
 14 Ms. Galli wrote: "Creators including @FaceReality16, @BravoBravoDuckingBravo, @BravoHistorian
 15 @TheTalkOfShame, and myself posted receipts showing that the individual accounts—which featured
 16 avatars of young, attractive, white women—were actually bots. Potentially using the services of a bot
 17 farm, they seemed to be purchased for a campaign aimed squarely at [Ms. Beauvais' fourteen-year-old
 18 son]. Someone coordinated an online attack against a child, using comments vocally supportive of ...
 19 Jenkins that parroted critiques about Beauvais by those same members of the cast."

20 27. An investigation into the accounts confirms that the comments set forth in Paragraph 20
 21 almost certainly came from bots and not real people. For example, the above described accounts lack
 22 personal information about the user, have suspicious handles incorporating a lot of numbers, few posts
 23 and the few posts are all on the exact same day, posting comments with poor grammar, were created in
 24 the last few months, and/or in some instances, such as "queenofthetea_," "laster9033," and
 25 "eleanorstephens798" have been deleted.

26 ³ Available at <https://twitter.com/ohchadwick/status/1562093535926550530> (last visited Sept. 7, 2022).

27 ⁴ Available at <https://twitter.com/ohchadwick/status/1562121511846264834> (last visited Sept. 7, 2022).

28 ⁵ Available at <https://www.thedailybeast.com/obsessed/garcelle-beauvais-son-jax-getting-death-threats-from-diana-jenkins-real-housewives-fan-army> (last visited Sept. 7, 2022).

28. Consistent with that, on information and belief, no one has identified a “real person” affiliated with any of the “users” who posted the comments in Paragraph 20. A significant number of social media users have read and reviewed the comments in Paragraph 20. On information and belief, no “real person” has admitted being one of the users who posted a comment in Paragraph 20. And, on information and belief, no one has been able to identify the real name and address of one of the users, even though numerous tools are available for uncovering the real identity of users with non-descript handles.

C. Online and Media Accusations that Ms. Jenkins (Falsely) Was the Source of the Bots

29. The third step of Defendant’s scheme was to have people conclude that Ms. Jenkins was the person who initiated the bot attack on Ms. Beauvais’ fourteen-year-old son. On information and belief, Defendant intentionally created the content of the messages to reference Ms. Jenkins, ostensibly support Ms. Jenkins, and state that Ms. Jenkins should be left alone. Framing the content of the bot messages in this manner predictably led people to believe that Ms. Jenkins was using the bots to send a warning to Ms. Beauvais. On information and belief, Defendant intentionally and maliciously so framed the content of the messages so that people would attribute the messages to Ms. Jenkins and so that her reputation would be damaged as a result.

30. Shortly after the messages were posted, based on their content, people began to conclude that Ms. Jenkins was the one responsible for the bot attack. On Instagram, numerous users posted comments in response to the messages referenced in Paragraph 20 claiming that Ms. Jenkins was the source of the bots. For example:

a. User handle “Cindyherrera223” received the following comments to four separate posts, respectively:

i. User “liz.eth.manriquez” stating, “Fake account created by \$\$ from @sdjneuro [Ms. Jenkins’ Instagram handle],” and user “_rmartinezz” stating, “FUCK YOU DIANA!!!! You’re [sic] disgusting human! So sad you we’re [sic] able to escape from Bosnia!”⁶

⁶ Available at <https://www.instagram.com/p/CdQPzPzq-CF/> (last visited Sept. 7, 2022).

- ii. User “carolannexx” stating: “@sdjneuro is this you?”⁷
- iii. User “katiecheese42” in reply to one of the comments stating: “@_jlozz you’re wasting your time 😊 this is clearly a newly created page that diana j[enkins] [sic] has sent out for the attack on [Ms. Beauvais’ fourteen-year-old son].”⁸
- iv. User “chevyman_jj” stated: “DIANA IS A RACIST.”⁹
- b. User handle “Ebonyharkey” received the following comments to two separate posts, respectively:
- i. User “mamasse_78” stating: “Ok Diana. Lisa. Or Erika. Which one of you THOTs [slang for someone who is sexually promiscuous]¹⁰ are responsible for this trash?”¹¹
- ii. User “damieongentry” stating: “Hi Lisa Rinna and Diana.”¹²
- c. User handle “Sutherland.antonina” received the following comment to one of her posts:
- i. User “_rmartinezz” stating: “FAKE ACCOUNT DIANAN [sic]! You’re 50 attacking a 14 year old with racist comments.”¹³
- d. User handle “Margaretcole8113” received the following comments:
- i. User “raemen16287” stating: “#dianajenkins,” in response to three separate posts.¹⁴
- ii. User “ayeyoli” stating: “This is all #Diana&Erika lame” in response to one of her posts.¹⁵

⁷ Available at <https://www.instagram.com/p/CdQPvBDKr9x/> (last visited Sept. 7, 2022).

⁸ Available at <https://www.instagram.com/p/CdQPf-3KT8u/> (last visited Sept. 7, 2022).

⁹ Available at <https://www.instagram.com/p/CdQPTRcqynV/> (last visited Sept. 7, 2022).

¹⁰ “Thot,” <https://www.dictionary.com/browse/thot> (last visited Sept. 7, 2022).


¹¹ Available at <https://www.instagram.com/p/CgQvHlotuZth/> (last visited Sept. 7, 2022).

¹² Available at <https://www.instagram.com/p/CgQuIMBOVpy/> (last visited Sept. 7, 2022).

¹³ Available at <https://www.instagram.com/p/CdvmXVgLFqt/> (last visited Sept. 7, 2022).

¹⁴ Available at <https://www.instagram.com/p/CgCeck3M0WV/> (last visited Sept. 7, 2022); available at <https://www.instagram.com/p/CgCeaToM-D3/> (last visited Sept. 7, 2022); available at <https://www.instagram.com/p/CgCeYtl suCS/> (last visited Sept. 7, 2022).

¹⁵ Available at <https://www.instagram.com/p/CgCeck3M0WV/> (last visited Sept. 7, 2022).

- e. User handle “Kariaugustine6” received the following comments to one of her posts:
 - i. User “tahilialee” stating: “This is a fake account created by @sdjneuro and @lisarinna it’s a bivouac and disgusting.”¹⁶
- f. User handle “Deborahbeal21” received the following comment to two separate posts:
 - i. User “raemen16287” stating: “#dianajenkins.”¹⁷
- g. User handle “Lidavis2447” received the following comments to one of her posts:
 - i. User “raemen16287” stating, “#dianajenkins,” and user “hbic328” stating, “Vile and disgusting going after a 14 year old! Who hired you  @sdjneuro perhaps[?]”¹⁸

31. Likewise, on Twitter, numerous users on August 23 and 24, 2022, concluded that Ms. Jenkins purchased these bots. For example:

- a. User “@ThePeachReport,” who has over 100,000 followers, tweeted: “Let’s call it what it is. All of those bots conveniently coming for Garcelle’s son after D*ana [Ms. Jenkins] and Garcelle’s recent clash on social media is no coincidence.”¹⁹ This tweet received nearly 300 retweets, 19 quote tweets and over 2,800 likes.
- b. User “@wrexweed,” who has over 3,300 followers, tweeted: “It’s disgusting Diana [Jenkins] paid for these bot accounts to harass Garcelle’s son. How would she feel if somebody did that to her kid.”²⁰ This tweet received nearly 200 retweets, 21 quote tweets, and over 3,600 likes.
- c. User “@marysolscup,” who has over 7,100 followers, tweeted: “Holy crap. It looks like Diana bought herself the bots that harassed Garcelle’s son as a birthday gift. Or someone bought them for her. Either way this is beyond effed [sic] up.”²¹ This

¹⁶ Available at <https://www.instagram.com/p/CgJPiBPux8r/> (last visited Sept. 7, 2022).

¹⁷ Available at <https://www.instagram.com/p/CgFX9S8oCY6/> (last visited Sept. 7, 2022); available at <https://www.instagram.com/p/CgFXpevomTL/> (last visited Sept. 7, 2022).

¹⁸ Available at <https://www.instagram.com/p/CgFiDaBpuLF/> (last visited Sept. 7, 2022).

¹⁹ Available at <https://twitter.com/thepeachreport/status/1562260720003211264> (last visited Sept. 7, 2022).

²⁰ Available at <https://twitter.com/wrexweed/status/1562143397917233152> (last visited Sept. 7, 2022).

²¹ Available at <https://twitter.com/marysolscup/status/1562183525457170432> (last visited Sept. 7, 2022).

tweet received 68 retweets, 3 quote tweets and 609 likes. In response to “@marysolscup[‘s]” tweet, user “@ledulce1” commented: “It’s Diana people, stop guessing.”²²

d. User “@bottomshame” tweeted: “Diana Jenkins spent years trafficking girls across Europe and now she’s hiring bots to attack THE Garcelle Beauvais’ children. Clown!”²³ This tweet received 110 retweets, 9 quote tweets and over 1,200 likes.

32. Numerous media outlets, blogs and other websites published articles on August 24, 26, 27, and 29, 2022, stating that Ms. Jenkins was being accused of hiring social media bots to harass Ms. Beauvais’ son. For example:

a. Jeroslyn Johnson at *ScreenRant* wrote an article titled: “Why RHOBH Fans Think Diana Used Bots to Attack Garcelle: The Real Housewives of Beverly Hills fans are convinced that Diana Jenkins is the one behind the bot accounts used to attack Garcelle Beauvais’ son.”²⁴ In the article, Ms. Johnson wrote: “After an onslaught of proven bot accounts bombarded Garcelle Beauvais’ 14-year-old son [], *The Real Housewives of Beverly Hills* fans think that Diana Jenkins is behind the attack; ‘Some fans are convinced that Diana is guilty of the crime. ‘Diana has her print all over this,’ one fan said. ‘This is a new low for Housewives;’” and “[RHOBH fans] also think all signs point to Diana as the one who paid to have bots attack Garcelle’s sons, although there is no hard proof of this.”

b. Avigail Landreneau at the website, *All About the Tea*, wrote an article titled: “Twitter ALLEGES Diana Jenkins PAID Bots To Attack Garcelle Beauvais’ Minor Son Online!”²⁵ Ms. Landreneau wrote: “Diana Jenkins has been accused of funding the vicious online bot attack on Garcelle Beauvais’ 14-year-old son.... It didn’t take long for astute social media users to recognize a pattern in the vitriol aimed at [Ms.

²² Available at <https://twitter.com/ledulce1/status/1562266972792004608> (last visited Sept. 7, 2022).

²³ Available at <https://twitter.com/bottomshame/status/1562464620635254786> (last visited Sept. 7, 2022).

²⁴ Available at <https://screenrant.com/why-rhobh-fans-diana-used-bots-attack-garcelle/> (last visited Sept. 7, 2022).

²⁵ Available at <https://allaboutthetea.com/2022/08/26/twitter-alleges-diana-jenkins-paid-bots-to-attack-garcelle-beauvais-minor-son-online/> (last visited Sept. 7, 2022) (emphasis in original).

1 Beauvais' fourteen-year-old son]. Viewers began sounding off and have been
2 slamming **Diana** for allegedly financing the cyberbullying ambush on [Ms.
3 Beauvais' fourteen-year-old son]." Ms. Landreneau added:

4 One fan wrote over a screenshot that captured a series of nasty
5 comments, "**Diana Jenkins** hired a bunch of Karen **bots** to
6 spam **Garcelle's** 14yo son. Look at these disgusting comments.
7 Usually I'd cover their names but since they're just **bots**, go after
8 them."

9 Another viewer wrote, "It's disgusting **Diana** paid for
10 these **bot** accounts to harass **Garcelle's** son. How would she feel if
11 somebody did that to her kid?"

12 A third tweeted, "**Garcelle's** [fourteen-year-old] son [] is receiving
13 hate comments on his Instagram. These are all **bot** accounts too.
14 Looking at each profile none of these accounts are real people.
15 Someone paid to have this done. Probably the social media warriors
16 Lisa or **Diana**. Very SUS."

17 One fan wrote, "I KNOW **Diana Jenkins** is behind that troll farm
18 that came for **Garcelle's** son. Those are not real accounts and only
19 one housewife pays for **bots**... Madame Diane."

20 Another chimed in, "Most of those accounts
21 under **Garcelle's** son were created recently and all have like 10+
22 pics that were posted on the same day! Definitely **bots** by **Diana**."

23 She further stated: "One [Twitter] user pointed out, 'Someone is paying for **bots** to
24 attack **Garcelle's** 14 year old son on instagram [sic] in support of **Diana & Erika**,
25 while also calling Oliver a drug addict. Weird that we're also seeing huge droves
26 of support on **Diana's** page.. seemingly also from **bots**.. must be a coincidence..?'"

27 c. Wolfgang Ruth at *Vulture* wrote in an article titled: "HuffPost Contributor Begs
28 You to Read Her 2010 Blog," that "as more harassment started to appear on [Ms.

Beauvais' fourteen-year-old son's] social media, people began suggesting Jenkins 'paid for bot accounts to go after' Beauvais and her family."²⁶

d. Lindsay Cronin at the website, *RealityBlurb*, wrote in an article titled: "RHOBH's Garcelle Beauvais and Sutton Stracke Unfollow Diana Amid Bot Rumors as Sutton Visits Oliver at Lisa Vanderpump's Vegas Restaurant," that there were "a slew of rumors suggesting Diana hired bots to attack Garcelle's 14-year-old-son [] with hurtful and even racist messages."²⁷

e. Perry Carpenter at the website, *Showbiz CheatSheet*, wrote in an article titled: "Inside Diana Jenkins' Scandalous Past Before 'RHOBH'," that "[t]he latest accusation is that Jenkins is behind racist death threats leveled at Beauvais' 14-year-old son [] on social media" and "[i]t appears that a targeted bot harassment campaign has been launched against Garcelle's [sic] 14-year-old son, and many fans believe Diana is responsible."²⁸

f. Evan Real at *Page Six* stated in an article titled: "Diana Jenkins hires '24/7' security, claiming death threats from 'RHOBH' fans," that "[a] portion of 'RHOBH' fans have accused Jenkins of hiring social media bots to post racist comments directed at Garcelle Beauvais' 14-year-old son []."²⁹

g. Uzoma Chinaka at the blog, *Nerd Stash*, wrote that "many people have accused her [Ms. Jenkins] of sponsoring inappropriate social media comments at Garcelle Beauvais' teenage son [];" and that RHOBH fans "believe that Diana Jenkins was behind it [the social media bot comments directed at Ms. Beauvais' son]."³⁰ She added in the same article: "The 49-year-old Bosnian star [Ms. Jenkins] is believed

²⁶ Available at <https://www.vulture.com/2022/08/diana-jenkins-garcelle-beauvais-attack-bots.html> (last visited Sept. 7, 2022).

²⁷ Available at <https://realityblurb.com/2022/08/29/rhobhs-garcelle-beauvais-and-sutton-stracke-unfollow-diana-amid-bot-rumors/> (last visited Sept. 7, 2022).

²⁸ Available at <https://www.cheatsheet.com/entertainment/inside-diana-jenkins-scandalous-past-before-rhobh.html/> (last visited Sept. 7, 2022).

²⁹ Available at <https://pagesix.com/2022/08/26/diana-jenkins-hires-24-7-security-after-alleged-death-threats/> (last visited Sept. 7, 2022).

³⁰ Available at <https://thenerdstash.com/diana-jenkins-hires-security-after-threats-from-rhobh-fans/> (last visited Sept. 7, 2022).

to be behind the racist comments, but she's crying out that she's innocent."

h. The website, *TimeFor.News*, stated that "Diana [Jenkins] and costar Garcelle Beauvais have been feuding on the show this season. And it all came to a head recently when Jenkins purportedly hired social media bots to post racial slurs about Garcelle's 14-year-old son []."31

i. The website, *Animated Times*, published an article stating that "people started harassing Beauvais's 14-year-old son on his social media. People accused Diana Jenkins of hiring social media bots to post racist comments."32

j. Ashabi Azeez at the website, *Inquisitr*, published an article stating that "[s]ome *RHOBB* fans have accused Diana of hiring social media bots to post racist comments about Garcelle Beauvais' 14-year-old son []."33

k. *Radar Online* reported in an article titled: "'Real Housewives' Star Diana Jenkins Forced To Hire Bodyguards Following Threatening Backlash From Fans," that "[Ms. Jenkins] **was accused** of buying bots to send cruel comments to Garcelle Beauvais' son."34

l. *TMZ* reported in an article titled: "'Real Housewives' Diana Jenkins GETS HIRED MUSCLE OVER DEATH THREATS ... After Fans Accuse Her of Racist Posts Targeting Son of Co-Star," that Ms. Jenkins "was deluged with death threats from Bravo fans furious over her alleged connection to racist online comments."35

33. Multiple YouTube video bloggers and a Reddit user went even further, directly accusing Ms. Jenkins of hiring the bots. For example:

a. Sharrell Lloyd of the YouTube video blog, *Sharrell's World*, which has over

³¹ Available at <https://timefor.news/real-housewives-star-diana-jenkins-gets-bodyguards-after-death-threats-over-racist-posts/> (last visited Sept. 7, 2022).

³² Available at <https://www.animatedtimes.com/real-housewives-of-beverly-hills-star-diana-jenkins-hires-24-7-security-amidst-accusations-of-instigating-racist-attacks-on-14-year-old-kid/> (last visited Sept. 7, 2022).

³³ Available at <https://www.inquisitr.com/10013532/rhobb-star-diana-jenkins-employs-security-alleging-death-threat> (last visited Sept. 7, 2022).

³⁴ Available at <https://radaronline.com/p/real-housewives-diana-jenkins-hires-bodyguards-death-threats-fans/> (last visited Sept. 7, 2022) (emphasis in original).

³⁵ Available at <https://www.tzm.com/2022/08/27/real-housewives-diana-jenkins-death-threats-bodyguards-racist-posts/> (last visited Sept. 7, 2022).

375,000 subscribers, posted a video titled: “Lisa Rinna & Diana Jenkins EXPOSED for using bots! Bravo & Network are PISSED!”³⁶ In the video, which has over 53,000 views, Ms. Lloyd states: “You’re [Ms. Jenkins] so full of it. Don’t act like you’re not racist. Don’t act like you don’t know what’s going on with the bots and you guys got caught, you and that no-good Lisa Rinna.”

b. Brooke Ashley of the YouTube video blog, *The Brooke Ashley*, which has nearly 15,000 subscribers, posted a video on August 25, 2022, titled: “Garcelle’s Son ATTACKED by bots!! ● | Diana Jenkins #1 Suspect! ☹️.”³⁷ In the video, which has nearly 11,000 views, Ms. Ashley states: “It’s just my theory, but I believe that Diana paid for these bots to attack [Ms. Beauvais’ fourteen-year-old son].”

c. A Reddit user posted: “DIGUSTED. BOTS That Attacked Garcelle’s Son were PAID FOR by Diana Jenkins!!!.... CHANGE MY MIND.”³⁸ The post received 106 comments.

34. These social and mainstream media comments represented the predictable and intended conclusion of Defendant’s actions: post comments attacking Ms. Beauvais’ son, ensure the user profiles will result in people knowing that the comments were posted by bots, and ensure that the content of the comments would lead people to conclude (falsely) that Ms. Jenkins was behind the attacks. Dozens of people concluded that Ms. Jenkins was the one behind the bot attack and thousands of viewers and readers were told that Ms. Jenkins was the one behind the bot attack.

35. Ms. Jenkins had no involvement whatsoever in this hateful and outrageous bot attack on Ms. Beauvais’ fourteen-year-old son. To make clear that she had no involvement, Ms. Jenkins posted on her Instagram account on August 26, 2022:

I have been accused of instigating the hateful and inexcusable cyber bullying of Garcelle’s son. Nothing could be further from the truth. I have stood for human

³⁶ Available at <https://www.youtube.com/watch?v=3kYzlyPOoHU> (last visited Sept. 7, 2022).

³⁷ Available at <https://www.youtube.com/watch?v=SE9vtVjxVWo> (last visited Sept. 7, 2022).

³⁸ Available at https://www.reddit.com/r/RIIOBH/comments/wwb0t7/disgusted_bots_that_attacked_garcelles_son_were/ (last visited Sept. 7, 2022).

@ronaldrichards

rights my whole life. There is no place for hate in this world.³⁹

D. Despite Ms. Jenkins' Denials, Ms. Jenkins and Her Family Have Received Numerous Death Threats, and Ms. Jenkins Has Endured Extensive False Negative Attacks on Her Reputation and Character.

36. Notwithstanding that Ms. Jenkins was not involved in this deplorable harassment directed at Ms. Beauvais' son whatsoever, Ms. Jenkins and her family (including her two-year-old daughter) have been the target of death threats as a result of Defendant's actions and people falsely concluding that Ms. Jenkins is responsible for the attacks.

37. For example, on August 26, 2022, Ms. Jenkins received a message on Instagram from a user "MI_AMOR_JASON" stating: "Attack Garcelle or her family again and we'll end you you [sic] goldigging slag!"

38. Similarly, on September 3, 2022, Ms. Jenkins received two highly disturbing and threatening comments on Instagram from a user known as "h (lollll1lll1)." He/she first responded to one of Ms. Jenkins' posts by stating: "kill yourself." He/she then responded to a post showing Ms. Jenkins' two-year-old daughter by appallingly stating: "hope you both die."

39. Ms. Jenkins received so many death threats that she consulted with security experts who concluded that the threats are credible. All this frightened and terrified Ms. Jenkins. She has been forced to hire four, around-the-clock bodyguards to protect her and her family, including her two-year-old daughter.

40. In an effort to stop the death threats, Ms. Jenkins posted on her Instagram page imploring for the death threats to stop, stating in an August 26, 2022 post: "To those people who have been attacking my family and threatening our lives, you are also spreading hate and creating fear. Please stop."⁴⁰ Despite that plea, the death threats have continued against Ms. Jenkins and her family.

41. In addition to receiving numerous death threats, Ms. Jenkins has endured numerous false claims online that she is a racist and other unwarranted attacks on her character as a result of Defendant's actions. For example:

³⁹ Available at <https://www.instagram.com/p/ChvAgQIP20n/> (last visited Sept. 7, 2022).

⁴⁰ Available at <https://www.instagram.com/p/ChvAgQIP20n/> (last visited Sept. 7, 2022).

- a. As noted in Paragraph 33(a), Sharrell Lloyd of *Sharrell's World*, asserted that Ms. Jenkins was behind the social media bots posting harassing comments on Ms. Beauvais' son's Instagram account because she is "racist."
- b. As described in Paragraph 30, several Instagram users posted comments on the social media bot accounts identified in Paragraph 20, accusing Ms. Jenkins of being racist or being responsible for racist comments being posted on Ms. Beauvais' son's Instagram account.
- c. Twitter user, "@furrypinkchaos," who has over 1,200 followers, posted "@BravoTV Okay now EVERYONE knows Lisa Rinna and Diana Jenkins are responsible and you need to get RID of these TOXIC, RACIST, MONSTERS!"⁴¹ The tweet received 82 likes.
- d. Twitter user, "@acechhh," who has approximately 29,000 followers, posted: "diana jenkins [sic] has the biggest loser energy I've ever seen. get [sic] off the show you unlikable racist lip licking weirdo."⁴²
- e. Twitter user, "@efabLiz", who has nearly 6,000 followers, tweeted: "The slithering Diana Jenkins is not only a bully, liar, and racist, she's a con artist."⁴³
- f. Twitter user, "@rosslcoe," who has approximately 3,000 followers posted a GIF of a woman putting her fist in the air with the word "THIS" on the GIF and then wrote: "Diana giving the signal to the racists [sic] bots."⁴⁴
- g. Twitter user, "@critic_social," who has nearly 2,000 followers, tweeted in response to a tweet from Ms. Beauvais: "I hope you know that Racist LipLicking [sic] Diana is behind this."⁴⁵
- h. Twitter user, "@tezzagotbagged," who has over 1,100 followers, posted: "Not Diana fake lipped licking ass using her divorce settlement money to buy bots to

⁴¹ Available at <https://twitter.com/furrypinkchaos/status/1563183980093906944> (last visited Sept. 7, 2022).

⁴² Available at <https://twitter.com/acechhh/status/1565761001198440448> (last visited Sept. 7, 2022).

⁴³ Available at <https://twitter.com/efabLiz/status/1565810121313320963> (last visited Sept. 7, 2022).

⁴⁴ Available at <https://twitter.com/rosslcoe/status/1562743419595722753> (last visited Sept. 7, 2022).

⁴⁵ Available at https://twitter.com/critic_social/status/1562528719616774144 (last visited Sept. 7, 2022).

bully garcelle's [sic] children. Always knew that one was racist. Nasty b!tch!
[sic]"⁴⁶

i. Twitter user, "@MadBeefs" tweeted in response to the "queenofthetea_" comment discussed in Paragraph 20(a): "Oh HELL NAH. This is the most racist and disgusting comment I've ever seen and it's pretty much confirmed it's coming from Diana Jenkins."⁴⁷

j. Twitter user, "@YikesItsTrey," also in response to the "queenofthetea_" comment: "I try not to be too personal with these shows (it's housewives for God's sake), but I just know Diana paid for these bots to harass [sic] Garcelle's teenage son. Diana, you are a loser, a racist, an asshole, and a coward. Please go seek help for your irrational behavior."⁴⁸

k. Twitter user, "@datlife808," also in response to the "queenofthetea_" comment: "Wow. I have no words. This one here tells me because they mention her that Diana did in fact buy these bots to harass this boy. And I can't even find this account on Instagram? What a racist bitch if indeed Diana is behind this."⁴⁹

l. Twitter user, "@dearlyymeghan," tweeted: "Diana and Shady Lips fans being racist and bringing Garcelle's children into all of this is going to make them crash and burn ... so gross."⁵⁰

m. Twitter user, "@twizler234," posted: "Diana Jenkins is trash and a racist [sic] who has a poor low life. How dare you attack those innocent children, just know Karma is real and it Never [sic] skips."⁵¹

n. Twitter user, "@GGianulias," tweeted: "What a terrible POS [piece of s***] she is! This is why Ho bags like her should sign prenups. Stupid racists with power are

⁴⁶ Available at <https://twitter.com/tezzagotbagged/status/1562478635168108544> (last visited Sept. 7, 2022).

⁴⁷ Available at <https://twitter.com/MadBeefs/status/1562426474837053443> (last visited Sept. 7, 2022).

⁴⁸ Available at <https://twitter.com/YikesItsTrey/status/1562293902803189761> (last visited Sept. 7, 2022).

⁴⁹ Available at <https://twitter.com/datlife808/status/1562242089659817984> (last visited Sept. 7, 2022).

⁵⁰ Available at <https://twitter.com/dearlyymeghan/status/1562225966776139778> (last visited Sept. 7, 2022).

⁵¹ Available at <https://twitter.com/twizler234/status/1563725098674229250> (last visited Sept. 7, 2022).

clearly dangerous.”⁵²

- o. Twitter user, “@Cheryl708” posted: “Garcelle didn’t use the race card. The attack to her son was absolutely racist. So, she defended her son. Diana is disgusting!”⁵³
- p. Twitter user, “@ItsPrecious_x” tweeted: “Diana is a racist. Get her off. NOW.”⁵⁴
- q. Twitter user, “@AdamsBryanne” posted: “Welp we can forget @GarcelleB ever come back this racist ass shit show if Diana comes back. That generic ass apology from @BravoTV was bullshit!!! Fire Diana & allow @GarcelleB & #[Ms. Beauvais' fourteen-year-old son] on @BravoWWHL for an exclusive interview!”⁵⁵
- r. Twitter user, “@BravoStraightUp” tweeted: “Anyone defending Diana Jenkins is at minimum low-key racist.”⁵⁶
- s. Twitter user, “@SamuelChoe4” posted: “Diana you gotta go. The fact that you think Garcelle is weaponizing her race. [Ms. Beauvais’ son] is 14! Always licking her lips 2 seconds lizard are a racist [sic] #RHOBH #RHOBHMeanGirls #Racist[.]”⁵⁷

FIRST CAUSE OF ACTION

INVASION OF PRIVACY BY FALSE LIGHT

42. Ms. Jenkins realleges and incorporates by reference Paragraphs 1 through 41 above as though expressly set forth herein.

43. Defendant’s use of social media account bots, i.e., fake social media accounts, to post malicious, harassing and offensive comments on the Instagram account of a fourteen-year-old child of a co-cast member of *The Real Housewives of Beverly Hills*, as described in Paragraph 20, that repeatedly reference support for Ms. Jenkins, was done with the deliberate intent to have Ms. Jenkins portrayed in a false light, including portraying Ms. Jenkins as the one who directed, orchestrated, participated or otherwise approved in having these malicious, harassing and offensive comments posted on Ms. Beauvais’

⁵² Available at <https://twitter.com/GGianulias/status/1563353609722507265> (last visited Sept. 7, 2022).

⁵³ Available at <https://twitter.com/Cheryl708/status/1562943678058233857> (last visited Sept. 7, 2022).

⁵⁴ Available at https://twitter.com/ItsPrecious_x/status/1562775191344021507 (last visited Sept. 7, 2022).

⁵⁵ Available at <https://twitter.com/AdamsBryanne/status/1562703558054924290> (last visited Sept. 7, 2022).

⁵⁶ Available at <https://twitter.com/BravoStraightUp/status/1562614588322959360> (last visited Sept. 7, 2022).

⁵⁷ Available at <https://twitter.com/SamuelChoe4/status/1562600136873693184> (last visited Sept. 7, 2022).

1 son's Instagram page and that Ms. Jenkins did so because she is a racist.

2 44. Defendant succeeded on his/her plan to portray Ms. Jenkins in this false light as countless
3 individuals on social media, the press, and otherwise directly accused Ms. Jenkins or discussed Ms.
4 Jenkins being accused of having these social media account bots post offensive and harassing comments
5 on Ms. Beauvais' son's Instagram page.

6 45. The impact of the false light campaign initiated by Defendant has been personal
7 reputational and professional. One, Ms. Jenkins and her family have received numerous death threats as
8 a result of Defendant's conduct, alarming Ms. Jenkins so much that she hired security guards to protect
9 her and her family. Two, Ms. Jenkins faced an avalanche of negative attacks on her character, accusing
10 her of being a racist and otherwise a person of ill repute. Her good reputation has been irreparably harmed
11 by the false light created by Defendant. Three, the prospects of Ms. Jenkins' businesses, which in the past
12 benefited from their affiliation with her, have diminished. Consumers that once would have been attracted
13 to the businesses based on Ms. Jenkins' brand are now more likely to do business elsewhere.

14 46. Defendant engaged in this above described conduct knowing full well that Ms. Jenkins had
15 no involvement in the bot attack and would find such conduct deplorable. On information and belief,
16 Defendant engaged in this above described conduct for the purpose of harming Ms. Jenkins, individually
17 and professionally.

18 47. The false light in which Defendant has placed Ms. Jenkins by virtue of its above described
19 conduct is highly offensive to a reasonable person.

20 48. Ms. Jenkins is embarrassed and distressed that family, friends, fans, potential employers,
21 business associates and the general public have seen the above described false accusations, which have
22 been widely disseminated through social media, news articles and the Internet.

23 49. As a direct and proximate result of Defendant's wrongful conduct, Ms. Jenkins suffered
24 and continues to suffer shame, mortification, hurt feelings, emotional distress, embarrassment,
25 humiliation, and injury to her peace of mind, including damage to Ms. Jenkins' reputation and standing in
26 the community. In addition, Ms. Jenkins suffered losses in the form of expenses paid for personal security
27 to protect her and her family. Further, Ms. Jenkins has suffered general and special damages including,
28 but not limited to, damage to her businesses, reputation, character and property, which will most likely

1 result in loss or reduction in earnings and profits in an amount which has yet to be ascertained. When Ms.
2 Jenkins ascertains the exact amount, she will seek leave of the Court to amend this Complaint to set forth
3 said amount. Defendant's actions are the sole or substantial factor in causing these damages.

4 50. Due to the oppressive, fraudulent or malicious conduct by Defendant, Ms. Jenkins will also
5 seek an award of punitive damages against Defendant for these outrageous acts.

6 **PRAYER FOR RELIEF**

7 WHEREFORE, Plaintiff Jenkins prays for judgment against Defendant as follows:

- 8 1. For compensatory damages according to proof;
9 2. For special, enhanced, punitive, or exemplary damages;
10 3. For interest, costs, and attorneys' fees;
11 4. For assumed damages; and
12 5. For any and all such other and further relief as the Court may deem just and proper.

13
14 Dated: September 8, 2022

Respectfully submitted,

15
16 /s/ Krista M. Enns

Krista M. Enns (SBN: 206430)

J. Erik Connolly (*pro hac vice forthcoming*)

17 Christopher J. Letkewicz (*pro hac vice*
18 *forthcoming*)

Benesch, Friedlander, Coplan & Aronoff LLP

19
20 Attorneys for Plaintiff SANELA JENKINS a/k/a
21 DIANA JENKINS
22
23
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27
28

JURY TRIAL DEMAND

PLAINTIFF Diana Jenkins hereby demands a trial by jury in the above-entitled action.

Dated: September 8, 2022

Respectfully submitted,

/s/ Krista M. Enns

Krista M. Enns (SBN: 206430)

J. Erik Connolly (*pro hac vice forthcoming*)

Christopher J. Letkewicz (*pro hac vice
forthcoming*)

Benesch, Friedlander, Coplan & Aronoff LLP

Attorneys for Plaintiff SANELA JENKINS a/k/a
DIANA JENKINS

@ronaldrichards

INSD Pro Se Civil (unrelated to imprisonment) IFP request 4/19

UNITED STATES DISTRICT COURT

for the

Southern District of Indiana

THE EXCELLENT THE EXCELLENT RAJ K. PATEL

Plaintiff(s)

-v-

JANE DOE and JOHN DOE

Defendant(s)

Case No.

(to be filled in by the Clerk's Office)

REQUEST TO PROCEED IN DISTRICT COURT WITHOUT
PREPAYING THE FILING FEE

NOTICE

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

INSD Pro Se Civil Non-prisoner IFP request 4/19

Answer the following questions to the best of your ability.

Note: If you do not tell the truth, the court may dismiss your lawsuit.

I. Personal Information

- 1) Are you employed? ☐ Yes ☒ No
- 2) Are you married? ☐ Yes ☒ No
 If "Yes," is your spouse employed? ☐ Yes ☐ No
- 3) Do you have any dependents that you are responsible for supporting?
☐ Yes ☒ No
 If "Yes," list them below:

Name (<u>initials for minor children only</u>)	Relationship to You	Age	Amount of Support Provided per Month
n/a			

- II. Income** - If you are married, your answers *must include your spouse's income*.
 (When calculating income, include any wages, salary, rent, child support, public assistance, unemployment compensation, disability payments, life insurance payments, pensions, annuities, workers' compensation, stock dividends and interest, gifts and inheritance, or other money you receive from any source.)

- 1) State your total *monthly* wages or salary? \$ 0.00
- 2) Provide the name and address of your employer(s):
n/a
- 3) State your spouse's total *monthly* wages or salary? \$ n/a

INSD Pro Se Civil Non-prisoner IFP request 4/19

- 4) State the amount of money you have received from any other source in the last twelve months, such as the sources listed above. Please attach an additional sheet if necessary.

<u>Source of income</u>	<u>Amount</u>
parents	19,000
	\$ _____
	\$ _____

III. **Expenses** - If you are married or have dependents, *your expenses should also include your household's expenses.*

(When calculating household expenses, you may include groceries, clothing, medical costs, utilities that are not included in your rental payments, transportation, and insurance.)

- 1) Identify the following amounts that you pay per month:

<input type="checkbox"/> Rent or <input type="checkbox"/> Mortgage	\$ <u>n/a</u>
Car payment(s)	\$ <u>n/a</u>
Alimony or court-ordered child support	\$ <u>n/a</u>
Credit card payment(s)	\$ <u>2000 + outstanding</u>

- 2) Do you have any other *monthly* expenses that you have not already listed?

☒ Yes ☐ No

If "Yes," list them below:

<u>Expense</u>	<u>Amount</u>
Medical	\$ <u>100</u>
Clothes	\$ <u>100</u>
Food	\$ <u>2000</u>

3) What are your total *monthly* expenses? \$ 2200

IV. Property - If you are married, your answers must *include your spouse's property*.

1) Do you own a car? ☐ Yes ☒ No If "Yes," list car(s) below:

<u>Make and Model</u>	<u>Year</u>	<u>Approximate Current Value</u>
n/a		\$
		\$

2) Do you own your home(s)? ☐ Yes ☒ No

If "Yes," state the approximate value(s). \$ _____

What is the amount of equity (assessed value of residence minus outstanding mortgage balance) in the home(s)? \$ _____

3) Do you have any cash or checking, savings, or other similar accounts?
☒ Yes ☐ No

If "Yes," state the total of such sums. \$ 4000 (cash advance loan)

4) Do you own any other property of value, such as real estate, stocks, bonds, trusts, or individual retirement accounts (e.g., IRA, 401 k), artwork or jewelry?

☐ Yes ☒ No

If "Yes," describe the property and the approximate value(s).

INSD Pro Se Civil Non-prisoner IFP request 4/19

V. **Other Circumstances** - Describe any other financial circumstance(s) that you would like the court to consider when reviewing this petition.

\$19,000 in check; this was to pay off credit card debt to attend family event; \$25,000+ in debt still; do not expect anything.

Patel v. United States, No. 1:22-cv-734-LAS (C.F.C. July 6, 2022), Dkt. 7 (IFP granted)

Raj K. Patel

I, _____, declare that I am the plaintiff bringing this complaint. I declare that I am unable to prepay the fee and that I am entitled to the relief sought in the complaint.

11/27/2022

/s/ Raj K. Patel

Date

Signature - Signed Under Penalty of Perjury

Print

Save As...

Add Attachment

Reset

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

THE EXCELLENT THE EXCELLENT RAJ K. PATEL

(b) County of Residence of First Listed Plaintiff Marion Cnty.
(EXCEPT IN U.S. PLAINTIFF CASES)(c) Attorneys (Firm Name, Address, and Telephone Number)
pro se

DEFENDANTS

JANE DOE and JOHN DOE

County of Residence of First Listed Defendant Indiana
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

NOV 30 2022

U.S. CLERK'S OFFICE

INDIANAPOLIS, INDIANA

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|-----------------------------------------|----------------------------|----------------------------|---------------------------------------------------------------|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 625 Drug Related Seizure	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 375 False Claims Act
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 626 of Property 21 USC 881	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 690 Other	<input type="checkbox"/> 820 Copyrights	<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 330 Federal Employers' Liability		<input type="checkbox"/> 830 Patent	<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 340 Marine		<input type="checkbox"/> 835 Patent - Abbreviated New Drug Application	<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 345 Marine Product Liability		<input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 450 Commerce
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)	<input type="checkbox"/> 350 Motor Vehicle		<input type="checkbox"/> 880 Defend Trade Secrets Act of 2016	<input type="checkbox"/> 460 Deportation
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 355 Motor Vehicle Product Liability			<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 360 Other Personal Injury			<input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692)
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 362 Personal Injury - Medical Malpractice			<input type="checkbox"/> 485 Telephone Consumer Protection Act
<input type="checkbox"/> 195 Contract Product Liability				<input type="checkbox"/> 490 Cable/Sat TV
<input type="checkbox"/> 196 Franchise				<input type="checkbox"/> 850 Securities/Commodities/Exchange
				<input checked="" type="checkbox"/> 890 Other Statutory Actions
				<input type="checkbox"/> 891 Agricultural Acts
				<input type="checkbox"/> 893 Environmental Matters
				<input type="checkbox"/> 895 Freedom of Information Act
				<input type="checkbox"/> 896 Arbitration
				<input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision
				<input type="checkbox"/> 950 Constitutionality of State Statutes

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

18 USC 1961; battery; conspiracy; 42 USC 1981, 1983, and 2000bb et seq.; and other

VI. CAUSE OF ACTION

Brief description of cause:

Find the person(s) responsible for claims and attach complaint to them.

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.DEMAND \$
\$6,000,000.00CHECK YES only if demanded in complaint:
JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE Loren A. Smith; see compl.DOCKET NUMBER 1:22-cv-1446 (Fed. Cl. 202_)DATE 11/27/2022 SIGNATURE OF ATTORNEY OF RECORD

/s/ Raj K. Patel

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

No. _____

In The

**United States District Court for the
Southern District of Indiana**

THE EXCELLENT THE EXCELLENT RAJ K. PATEL,
from all capacities,

Plaintiff

v.

JANE DOE and JOHN DOE,

Defendant.

NEW CIVIL ACTION

THREE-JUDGE DISTRICT COURT REQUESTED

PRO SE COMPLAINT

T.E., T.E. Raj K. Patel (*pro se*)
Indiana | Georgia | New Jersey
6850 East 21st Street
Indianapolis, IN 46219
Marion County
rajp2010@gmail.com
www.rajpatel.live
317-450-6651

November 27, 2022

CERTIFICATE OF INTEREST

I, THE EXCELLENT, THE EXCELLENT Raj K. Patel (pro se), am appearing without counsel, like I did in the courts below. Giving Full Faith to the United States Constitution, I use the Authority of my omnipresent Styles and Office in these proceedings into which I avail myself. U.S. const. art. IV, § 1 & amend. XIV, & art. VI, § 1 referring to the Treaty of Paris (1783) & Paris Peace Treaty – Cong. Proclamation of Jan. 14, 1784.

I have completed five (5) out of the six (6) semesters of my juris dr. candidacy at the U. of Notre Dame L. Sch. in South Bend, IN., where I was enrolled from August 2015 to November 2017, and I have completed sixty-eight (68) out of the ninety (90) credit hours for a juris dr. candidacy at the Notre Dame L. Sch.

Such, I have completed the minimum number of credit hours required by the accrediting Am. B. Ass'n ("A.B.A.") to allow a law school to accredit me a juris dr. degree.

Amongst the grades in my juris dr. academic courses I received at the Notre Dame L. Sch., I received an A-/A in contracts law, an A-/A in civil procedure, and a B/A in constitutional law, while under Weapon S. In the summer of 2016, I worked as summer associate with the City of Atlanta Law Department in Atlanta, GA. In the summer of 2017, I worked as a summer associate at Barnes & Thornburg LLP in Indianapolis, IN.

And, I hold a Bachelor of Arts in Poli. Sci. and *cum laude* in Religion from Emory U., Inc. of Atlanta, Georgia, and I attended both Oxford College and Emory College, and graduated, in 2014, with a 3.718/4.0 grade point average with no pass/fail grades.

Emory U., Inc. is ranked as a top-20 or top-25 *U.S. News* Tier 1 best national university, and the Notre Dame L. Sch. is ranked as a *U.S. News* Top 25 best law school in the United States.

I was Student Body President of the Brownsburg Cmty. Sch. Corp. from 2009-2010 and Student Body President of Emory U., Inc. from 2013-2014. I was also the Notre Dame L. Sch. Student B. Ass'n Rep. to the Ind. State B. Ass'n from September 2017 to November 2017. All jurisdictions are "local" and with an "international" constituency.

Each time I was elected Student Body President, I attained thenceforth omnipresent Styles ("THE EXCELLENT" for each election) which are protected by both the Privileges & Immunities Clause and Privileges or Immunities Clause of the United States Constitution. U.S. const. art. IV, § 2, cl. 1 & amend. XIV, § 1, cl. 2. *See generally* Federalist 80 & *Printz v. United States*, 521 U.S. 898, 918 (1997) quoting *Principality of Monaco v. Mississippi*, 292 U.S. 313, 322 (1934).

I am well read in the material law. I have not received legal advice or counsel from anyone else for this case.

TABLE OF CONTENTS

CERTIFICATE OF INTEREST	I
TABLE OF CONTENTS.....	II
RELATED CASES.....	III
<i>PRO SE COMPLAINT</i>	1
PARTIES	4
SUBJECT-MATTER JURISDICTION.....	4
WELL-PLEADED COMPLAINT STANDARDS	5
STATEMENT OF FACTS	10
CLAIMS	41
DEMAND FOR RELIEF	75

RELATED CASES

FEDERAL CASES

1. *Patel v. United States*, No. 2022-1131 (Fed. Cir. May 19/June 2, 2022), *cert. denied*, No. 22-5280 (U.S. 2022).
2. T.E., T.E. Raj K. Patel *v. United States*, No. 1:21-cv-02004-LAS (C.F.C. Nov. 5, 2021).
3. *Patel v. Biden et al.*, No. 2022-5057 (D.C. Cir. June 8, 2022).
4. *Patel v. Biden et al.*, No. 1:22-cv-00394-UNA (D.D.C. Mar. 9, 2022).
5. *Patel v. Chief of Staff, The Executive Offices of the President of the United States*, No. 2022-1962 (Fed. Cir. 2022) (mot. for stay) (filed June 29, 2022).
6. *Patel v. The Executive Offices of the President*, No. 7419 (CBCA June 24, 2022).
7. *Patel v. Biden et al.*, No. 1:22-cv-01658-DLF (D.D.C. June 29, 2022) (pet. for writ of mandamus § 1361).
8. *Patel v. Biden et al.*, No. 1:22-cv-2957-MLB (N.D. Ga. Oct. 3, 2022) (pet for. writ of mandamus § 1361).
9. *Patel v. United States*, No. 1:22-cv-00734-LAS (C.F.C. 2022) (pet. for writ of mandamus § 1651).
10. *Patel v. United States*, No. 2:22-cv-02624-WB (E.D. Pa. 2022) (pet. for writ of mandamus § 1361), *transferred*, No. 1:22-cv-01576-JPH-MG (S.D.I.N. 2022), *dismissed due to filing bar*.
11. *Patel v. United States*, No. 1:22-cv-1446-LAS (C.F.C. 202_).

Federal Courts Without Subject-Matter Jurisdiction for Big Tucker Act Claims

12. *Patel v. Trump Corp.*, No. 20-1513, 141 S. Ct. 2761 (June 14, 2021), *reh'r'g denied*, 141 S.Ct. 2887 (U.S. Aug. 2, 2021).
13. *Doe v. Trump Corp.*, No. 20-1706, 2020 WL 10054085 (2d Cir. Oct. 9, 2020).
14. *Doe et al. v. The Trump Corp. et al.*, No. 1:18-cv-9936-LGS (S.D.N.Y. May 26, 2020), Dkt. 272.
15. *Patel v. F.B.I. et al.*, No. 1:18-cv-3441-RLY-DML (S.D.I.N. Nov. 13, 2018).
16. *Patel v. F.B.I. et al.*, No. 1:18-cv-3442-WTL-DML (S.D.I.N. Nov. 13, 2018).
17. *Patel v. F.B.I. et al.*, No. 1:18-cv-3443-TWP-MJD (S.D.I.N. Nov. 13, 2018).
18. *Patel v. Trump et al.*, No. 1:20-cv-454-SEB-DML (S.D.I.N. Feb. 19, 2020).
19. *Patel v. Trump et al.*, No. 1:20-cv-758-RLY-MJD (S.D.I.N. Apr. 14, 2020).
20. *Trump v. Vance, Jr. et al.*, No. 1:19-cv-8694-VM (S.D.N.Y. July 9, 2020), Dkt. 45.
21. *Patel v. Patel et al.*, No. 20-2713 (7th Cir. Jan. 21, 2021).

22. *Patel v. Patel et al.*, No. 1:20-cv-1772-TWP-MPB (S.D.I.N. Sept. 1, 2020).
23. *Carroll v. Trump*, No. 1:20-cv-7311-LAK (S.D.N.Y. Oct. 28, 2020), Dkt. 36.
24. *Patel v. Martinez et al.*, No. 3:21-cv-241 RLM-JPK (N.D.I.N. Apr. 8, 2021).
25. *Patel v. The President of the United States Joe Biden et al.*, No. 2:21-cv-01345-APG-EJY (D. Nev. Aug. 9, 2021).
26. *Patel v. United States*, No. 1:21-cv-22729-BB (S.D. Fla. Aug. 12, 2021).
27. *Patel v. United States et al.*, No. 1:21-cv-2219-JMS-TAB (S.D.I.N. Aug. 20, 2021).
28. *Patel v. United States et al.*, No. 1:21-cv-2263-UNA (D.D.C. Sept. 8, 2021).
29. *Patel v. United States et al.*, No. 2:21-cv-4160-NKL (W.D. Mo. Sept. 13, 2021).
30. *Patel v. United States et al.*, No. 2:21-cv-16029-SDW-CLW (D.N.J. Sept. 20, 2021).
31. *Patel v. The United States et al.*, No. 1:21-cv-6553-LTS (S.D.N.Y. Sept. 20, 2021).
32. *Patel v. The United States et al.*, No. 1:21-cv-2250-RLY-MG (S.D.I.N. Sept. 21, 2021).
33. *Patel v. United States et al.*, No. 1:21-cv-11429-LTS (D. Mass. Sept. 24, 2021).
34. *Patel v. Biden et al.*, No. 21-5155 (D.C. Cir. Sept. 27, 2021).
35. *In Re Raj K. Patel*, No. 21-5153 (D.C. Cir. Aug. 6, 2021).
36. *Patel v. Biden et al.*, No. 1:21-cv-1076-TSC (D.D.C. July 2, 2021).
37. *The Excellent Raj Patel v. The United States et al.*, No. 1:21-cv-3335-MLB (N.D. Ga. Oct. 5, 2021).
38. *The Excellent Raj Patel v. The United States et al.*, No. 1:21-cv-3376-MLB (N.D. Ga. Oct. 5, 2021).
39. *Patel v. United States et al.*, No. 3:21-cv-628-RLM-APR (N.D.I.N. Oct. 7, 2021).
40. *Patel v. Biden et al.*, No. 22-cv-465-JMS-MG (S.D.I.N. Mar. 24, 2022).
41. *In Re Raj Patel*, No. 22-mc-00024-TWP (S.D.I.N. Mar. 28, 2022) (2 yr. prejudice from filing before the S.D.I.N.). *Contra*. ECF 31, *Patel v. United States*, No. 22-1131 (Fed. Cir. 2022).
42. **NOT RELATED:** *Patel v. The Univ. of Notre Dame du Lac*, No. 1:22-cv-01329-JPH-MG (S.D.I.N. July 8, 2022) (notice of removal) (dismissed), *pending appeal*, 22-2251 (7th Cir. 202_). (*see infra* #43).

STATE CASE

43. *Patel v. Patel*, No. 32D05-1808-PO-000372 (Ind. Super. Ct. Aug. 21, 2018).
44. **NOT RELATED:** *Patel v. The Univ. of Notre Dame du Lac*, No. 49D05-2206-CC-019517 (Ind. Super. Ct., Marion Cnty. 5 2022)

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF INDIANA

THE EXCELLENT THE EXCELLENT
RAJ K. PATEL, from all capacities,

Plaintiff

v.

JANE DOE and JOHN DOE

Defendant

No. _____

THREE-JUDGE DISTRICT COURT
REQUESTED

Dated: November 27, 2022

PRO SE COMPLAINT

I, T.E., T.E Raj K. Patel (*pro se*), respectfully move this United States District Court for the Southern District of Indiana to restore the privileges and/or immunities (privileges and/or immunities during and after office and for all acts before taking office, as privileges or immunities are “basic” protections, in other words for and against inherently violent things, such as for allowing use of force without statutory license and against a bio-tech stress-depression weapon) I hold under the United States Constitution, including while I was the Representative to the Indiana State Bar Association of the Great State of Indiana and which I carry as 2013-2014 Student Government Association President of Emory University, Inc. (corporate sovereign 2013-present) in Atlanta, Georgia and 2009-2010 Student Body President of the Brownsburg Community School Corporation (“B.C.S.C.”) (corporate sovereign 2009-present) in Brownsburg, Indiana. U.S. const. const. art. IV, § 2¹ & amend. XIV, § 1². 18 U.S.C. §§ 175, 241, 242, 245(b)(2)(A)-(B) & (F), *Burwell v. Hobby Lobby Stores, Inc.*, 134 S. Ct. 2751, 2270 (U.S. 2014), 28 U.S.C. §

-
1. “The citizens of each state shall be entitled to all privileges and immunities of citizens in the several states.”
 2. “No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States...” (includes state- and federal- created corporations, *see* Grievance 21, Decl. of Independence (1776) and U.S. const. art. VI, § 1).

1491(a)(1)-(2), and 18 U.S.C. §§ 2340 *et seq.* U.S.; U.S. const. art. VI, § 1 and Grievances 21 & 23, Decl. of Indep. (1776)³; U.S. const. art. IV, § 1. My property has been stolen or taken. U.S. const. amend. V.

In addition to the necessary trespass and auto-stalking and because of the number of encounters I have had with and am having with this stress weapon and the other parties involved, local, state, and federal support was important or the lack thereof. *See generally Asahi Metal Indus. Co. Ltd. v. Super. Ct.*, 480 U.S. 102 (1987) (stream of commerce; supply-chain theory) and 18 U.S.C. §§ 1951 & 1961.

Counter-weapons also do not work, which are available through either over-the-counter or prescription, which would stop attack on the human evolution of my future direct descendants, as the weapon is closely connected with the brain or cerebellum. U.S. const. amend. II. Beyond these aforementioned statutory and constitutional matters, my First Amendment right to Free Exercise of Religion (i.e. gains for forward human evolution, including physical exercising; my religion tells me to workout; brain's religious-side was prevented from being used, *see* 18 U.S.C. § 247(a)(2) and *infra* (Framer's comment on the mind))⁴, Freedom of Expression, Academic Freedom, prohibition of Establishment of Religion (Plaintiff, who is Constitutionally styled "The Excellent" in the United States for his political executive offices, including from Emory University (school of one of President Obama's half-brothers, Mark Obama))⁵, White, Indian, etc. terrorists,

3. Disengaging the bio-tech weapon is therefore a priority for T.H. (T.E.) President of the United States.

4. "The "exercise of religion" involves "not only belief and profession but the performance of (or abstention from) physical acts" that are "engaged in for religious reasons." *Hobby Lobby*, 134 S. Ct. at 2270 quoting *Employment Div. v. Smith*, 494 U.S. 872, 877 (1990). "It means, too, the right to express those beliefs and to establish one's religious (or nonreligious) self-definition in the political, civic, and economic life of our larger community." *Hobby Lobby*, 134 S. Ct. at 2285 (Kennedy, J., concurring).

5. *Students for Fair Admissions, Inc. v. President & Fellows of Harvard Coll.*, No. 20-1199 (U.S. 202_) (especially applicable to the 2009-2010 and 2014-2015 and other admissions cohorts) (describing terroristic efforts to re-categorize Asian-Americans, East-, South- and Central-, into "all Asians are smart" or "all Asians are not smart" based on its admissions application "likeability" factor).

Fourth Amendment unlawful search and seizure, 13th Amendment, 5th and/or 14th Amendment Due Process, the Guarantee Clause, federally-prohibited “pains” were violated, breach of contract, defamation, theft of intellectual property (my verbatim word patterns), and civil-Racketeer Influenced and Corrupt Organizations (“R.I.C.O.”) Act (with possible multiple predicate crimes) violations, tortious interference in a business transaction, honest services duties, and functional removal the constitutional office of a candidate for the United States Presidency. 18 U.S.C. §§ 1931-34, 1951, & 1961 *et seq.* (minimum two predicate acts include extortion of intellectual property, which is also Taking, interference of law school applications, interference with college applications, interference in academic coursework in middle school, high school, Emory University, and Notre Dame Law School, making me obese (“serious bodily injury”), interfering with my political subdivision incumbencies from 2009-2010, 2013-2014, and 2017, use of biological weapon, and use of neuro-chemical weapon) and 42 U.S.C. § 1983. 18 U.S.C. §§ 1961–1968 & 1343–1346; *United States v. Nixon*, 418 U.S. 683 (1974); and *Bivens v. Six Unknown Named Agents*, 403 U.S. 388 (1971).

Relief is proper under 28 U.S.C. §§ 1491(a)(1)-(2) and the respective civil relief statutes for R.I.C.O., 18 U.S.C. §§ 1961 *et seq.*, honest services fraud, 18 U.S.C. §§ 1931-34, prohibition on intimidating in commerce, 18 U.S.C. § 1951, interstate and foreign racketeering, 18 U.S.C. § 1952, civil rights, 42 U.S.C. §§ 1981-1985 and 18 U.S.C. §§ 241 *et seq.*, and genocide, 18 U.S.C. §§ 1091(b)-(c). 28 U.S.C. § 1652. Nonetheless, the University of Notre Dame du Lac, in South Bend, Indiana, denied me my re-admissions permanently as of July-August 2021, even though medical professionals approved me for re-admissions since January 2018, and its acts violate the privileges of being a student who seeking a juris doctor degree. *See e.g.*, 18 U.S.C. §§ 241 *et seq.* (privilege of being a student; incumbency of being Representative from the Notre Dame Law School Student Bar

Association to the Indiana State Bar Association) (all university admissions is regulated by the United States Department of Defense, as I know through partisan information) (local police is regulated by the United States Department of Homeland Security) (lawyers are very likely to continue politics and are essential in cultivating government policy). *See* 42 U.S.C. § 1983.

In the alternative, this court should construe this complaint as a motion for judicial review and issue the appropriate relief.

Regardless, the monetary sum should be **approximately \$6,000,000,000.00 after taxes**, plus other non-money compensation and relief.

PARTIES

The Plaintiff is a citizen of Indiana and currently lives at 6850 East 21st Street, Indianapolis, IN 46219.

Jane Doe, the Defendant, is unknown and can be more than one person.

John Doe, the Defendant, is unknown and can be more than one person.

SUBJECT-MATTER JURISDICTION

The Constitution is violated, especially the 5th Amendment Due Process (with Lenity), the 14th Amendment Due Process (with Lenity), and the clauses protecting Privileges and/or Immunities Clause. Federalist 80. U.S. const. art. IV, § 2 & amend. XIV, § 1, cl. 2. *In re Quarles and Butler*, 158 U.S. 532 (1895)) (including but not limited to “the right to inform the United States authorities of violation of its laws”). *See e.g., United Bldg.*, 465 U.S. at 208 and *Bivens*, 403 U.S. at 388.

Acts of Congress material to the case include, but are not limited to, 18 U.S.C. §§ 241 *et seq.* (deprivation of privileges and/or immunities), 18 U.S.C. §§ 1961-1968 (R.I.C.O.), 42 U.S.C. §§ 1981-1983 (deprivation of civil rights, 5th Amendment; theft of

intellectual property), and 18 U.S.C. §§ 1931-1934 (honest services) (theft of intellectual property; protection).

WELL-PLEADED COMPLAINT STANDARDS

“[A] *pro se* complaint, however inartfully pleaded, must be held to less stringent standards than formal pleadings drafted by lawyers.” *Erickson v. Pardus*, 551 U.S. 89, 94 (2007). *Pro se* plaintiffs are “not expected to frame issues with the precision of a common law pleading.” *Roche v. U.S. Postal Serv.*, 828 F.2d 1555, 1558 (Fed. Cir. 1987). *Nat’l Bank v. Republic of China*, 348 U.S. 356, 362 (1955) (the covenant of good faith and fair dealing prohibits the claiming of immunity, including those legally and statutory provided).

Under the Fed. R. Civ. P. 8(a)(2), a pleading must contain a “short and plain statement of the claim showing that the pleader is entitled to relief.” As the Court held in *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544 (2007), the pleading standard Rule 8 announces does not require “detailed factual allegations,” but it...must contain sufficient factual matter, accepted as true, “enough to state a claim to relief that is plausible on its face.” *Id.*, at 570. A claim has facial plausibility when the plaintiff pleads factual content that allows the court to draw the reasonable inference that the defendant is liable for the misconduct alleged. *Id.*, at 556. The plausibility standard is not akin to a “probability requirement,” but it asks for more than a sheer possibility that a defendant has acted unlawfully. *Id.* and *see also Iqbal*, 556 U.S. at 662. In other words, the court must assess whether “a claim has been stated adequately” and whether “it may be supported by [a] showing [of] any sets of facts consistent with the allegations in the complaint.” *Twombly*, 550 U.S. at 563. The plaintiff’s factual allegations “must be enough to raise a right to relief above the speculative level.” *Id.* at 555. In reviewing plaintiff’s allegations in support of jurisdiction, Federal Claims Court must presume all undisputed facts are true and construe all reasonable inferences in plaintiff’s favor. *Scheuer v. Rhodes*, 416 U.S.

232, 236 (1974), *abrogated on other grounds by Harlow v. Fitzgerald*, 457 U.S. 800, 814-15 (1982).

“[Complaints] must be construed so as to do justice.” Fed. R. Civ. P. 7(b) & 8(e).

For the parts in a complaint related to R.I.C.O., *H.J. Inc. v. NW Bell Tel. Co.*, 492 U.S. 229, 248-250 (1989) states, as precedent to *Twombly* (2007) and *Iqbal* (2009), that “the facts alleged in the complaint [by a petitioner or prosecutor, must be read] in the light most favorable to petitioners...[and courts may only dismiss] the complaint if “it is clear that no relief could be granted under any set of facts that could be proved consistent with the allegations.” *H.J. Inc.*, 492 U.S. at 248-250 citing *Hishon v. King & Spalding*, 467 U.S. 69, 73 (1984). “Congress drafted RICO broadly enough to encompass a wide range of criminal activity, taking many different forms and likely to attract a broad array of perpetrators operating in many different ways.” *H.J. Inc.*, 492 U.S. at 248. Moreover,

As [Supreme] Court stressed in *Sedima*, in rejecting a pinched construction of RICO's provision for a private civil action, adopted by a lower court because it perceived that RICO's use against non-organized-crime defendants was an “abuse” of the Act, “Congress wanted to reach both *legitimate*’ and *illegitimate*’ enterprises.” 473 U.S. at 499. *Legitimate businesses* “enjoy neither an inherent incapacity for criminal activity nor immunity from its consequences”; and, as a result, § 1964(c)’s use “against respected businesses allegedly engaged in a pattern of specifically identified criminal conduct is hardly a sufficient reason for assuming that the provision is being misconstrued.”

Sedima, S.P.R.L. v. Imrex Co., Inc., 473 U.S. 479 (1985). In the concurrence of *H.J. Inc.*, 492 U.S. at 256, Justice Scalia wrote:

However unhelpful its guidance may be, however, I think the Court is correct in saying that nothing in the statute supports the proposition that predicate acts constituting part of a single scheme (or single episode) can never support a cause of action under RICO. Since the Court of Appeals here rested its decision on the contrary proposition, I concur in the judgment of the Court reversing the decision below.

See generally Dred Scott v. Sandford, 60 U.S. (19 How.) 393 (1856), *United States v. Nixon*, 418 U.S. 683 (1974) (no person or no project/experiment is above the law, the

Federalist Project/Experiment), *Clinton v. Jones*, 520 U.S. 681 (1997) (individual's acts before becoming president are not subject to Presidential immunity), and *Nixon v. Fitzgerald*, 457 U.S. 731 (1982) (immunity limited to official acts). *See also* Fed. R. Civ. P. 21. *Cf.* parties to a case. "No man is above the law and no man is below it: nor do we ask any man's permission when we ask him to obey it," said United States President Theodore Roosevelt. *See also* Paris Peace Treaty – Cong. Proclamation of Jan. 14, 1784 (every citizen should uphold the Treaty of Paris "sincerely, strictly, and completely"). *See also* U.S. const. amend. XI (states not immune). *See also* *Downs v. Bidwell*, 182 U.S. 244, 382 (1901) ("No higher duty rests upon this Court than to exert its full authority to prevent all violation of the principles of the Constitution."). *U.S. v. Lee*, 106 U.S. 196, 220 (1882) (Miller, J.):

No man in this country is so high that he is above the law. No officer of the law may set that law at defiance with impunity. All the officers of the government, from the highest to the lowest, are creatures of the law and are bound to obey it. It is the only supreme power in our system of government, and every man who by accepting office participates in its functions is only the more strongly bound to submit to that supremacy and to observe the limitations which it imposes upon the exercise of the authority which it gives...

Courts of justice are established not only to decide upon the controverted rights of the citizens as against each other, but also upon rights in controversy between them and the government...[the] Secretary of War...[and] officer had no more authority to make than the humblest private citizen.

Substantive Due Process and the Privileges and Immunities Clause both require my complaint and statements and evidence to be weighed in my favor. *Dobbs v. Jackson Women's Health Organization*, No. 19-1392 * 14-15 (U.S. Jun. 24, 2022) (as applied to the Fifth Amendment's Due Process Clause, the original Privileges and Immunities Clause,

and "Liberty" referred in U.S. const. art. VI, § 1 (Decl. of Indep. (1776))⁶. *Dobbs*, No. 19-1392 * 4 ("To answer that question, we would need to decide important antecedent questions, including whether the Privileges or Immunities Clause protects *any* rights that are not enumerated in the Constitution and, if so, how to identify those rights."). *Dobbs*, No. 19-1392 * 6 ("For instance, in *Dred Scott v. Sandford*, 19 How. 393 (1857), the Court invoked a species of substantive due process to announce that Congress was powerless to emancipate slaves brought into the federal territories."). See Madison, Monday, June 18, in Committee of the whole, on the propositions of Mr. Patterson & Mr. Randolph, *The Records of the Federal Convention of 1787*, vol. 1, pp. 285-291, New Haven: Yale U. Press, 1911, Edited by Max Farrand, https://oll.libertyfund.org/title/farrand-the-records-of-the-federal-convention-of-1787-vol-1#lf0544-01_head_163; Madison, Monday, June 25, in Convention, *The Records of the Federal Convention of 1787*, vol. 1, pp. 398-405, New Haven: Yale U. Press, 1911, Edited by Max Farrand, https://oll.libertyfund.org/title/farrand-the-records-of-the-federal-convention-of-1787-vol-1#lf0544-01_head_210; Yates, Monday, June 25, in Convention, *The Records of the Federal Convention of 1787*, vol. 1, pp. 410-416, New Haven: Yale U. Press, 1911. Edited by Max Farrand,

6. *Dobbs*, No. 19-1392 * 14-15 ("In interpreting what is meant by the Fourteenth Amendment's reference to "liberty," we must guard against the natural human tendency to confuse what that Amendment protects with our own ardent views about the liberty that Americans should enjoy. That is why the Court has long been "reluctant" to recognize rights that are not mentioned in the Constitution. *Collins v. Harker Heights*, 503 U.S. 115, 125 (1992). "Substantive due process has at times been a treacherous field for this Court," *Moore v. East Cleveland*, 431 U.S. 494, 503 (1977) (plurality opinion), and it has sometimes led the Court to usurp authority that the Constitution entrusts to the people's elected representatives. See *Regents of Univ. of Mich. v. Ewing*, 474 U.S. 214, 225-226 (1985). As the Court cautioned in *Glucksberg*, "[w]e must . . . exercise the utmost care whenever we are asked to break new ground in this field, lest the liberty protected by the Due Process Clause be subtly transformed into the policy preferences of the Members of this Court." 521 U.S., at 720 (internal quotation marks and citation omitted). On occasion, when the Court has ignored the "[appropriate limits]" imposed by "respect for the teachings of history," *Moore*, 431 U.S., at 503 (plurality opinion), it has fallen into the freewheeling judicial policymaking that characterized discredited decisions such as *Lochner v. New York*, 198 U.S. 45 (1905). The Court must not fall prey to such an unprincipled approach. Instead, guided by the history and tradition that map the essential components of our Nation's concept of ordered liberty, we must ask what the *Fourteenth Amendment* means by the term "liberty." When we engage in that inquiry in the present case, the clear answer is that the Fourteenth Amendment does not protect the right to an abortion.").

<https://oll.libertyfund.org/title/farrand-the-records-of-the-federal-convention-of-1787-vol-1#lf0544-01> head 211. *Poindexter v. Greenhow*, 114 U.S. 270, 290 (1884) (“the distinction between the government of a State and the State itself is important, and [shall] be observed.”) (underline added); *Id.* at 290 (“in common speech,...to say “*L’État c’est moi.*””); see also United States Order of Precedence by the Office of the Chief of Protocol of the United States Dep’t of State, <https://www.state.gov/wp-content/uploads/2022/02/United-States-Order-of-Precedence-February-2022.pdf> (revised Feb. 11, 2022) (elaboration on the Privileges and Immunities Clause, U.S. const. art. IV, § 2) (all T.E.’s ranks above “1. The President of the United States”; thus, T.E. T.E. Raj K. Patel ranks above “1. The President of the United States”); *Maine Cmty. Health Options v. United States*, 140 S. Ct. 1308, 1334 (Alito, J., dissenting) (internal citations omitted) (“federal common law” has unique interests); Federalist 80 (“It may be esteemed the basis of the Union, that “the citizens of each State shall be entitled to all the privileges and immunities of citizens of the several States.” And if it be a just principle that every government OUGHT TO POSSESS THE MEANS OF EXECUTING ITS OWN PROVISIONS BY ITS OWN AUTHORITY.”); and compare U.S. const. art. IV, §§ 1-2; with U.S. const. art. VI, § 1 referring to Articles of Confederation (1781), art. IV, paras. 1 & 3 (“The better to secure and perpetuate mutual friendship and intercourse among the people of the different States in this Union [i.e., Doctrine of Comity in U.S. const. art. IV, § 2], the free inhabitants of each of these States, paupers, vagabonds, and fugitives from justice excepted, shall be entitled to all privileges and immunities of free citizens in the several States;...provided also that no imposition, duties or restriction shall be laid by any State, on the property of the United States, or either of them.” // “Full faith and credit shall be given in each of these States to the records, acts, and judicial proceedings of the courts and magistrates of every other State.”) (“magistrates” replaced with

“citizen”) (*see* Dkt. 21 at 13) (*see also* *Patel v. United States*, No. 1:21-cv-02004-LAS (Fed. Cl. 2022), Dkt. 1 at 9-10 n. 6)). *See e.g.*, *Vosburg v. Putney*, 80 Wis. 523, 527-528, 50 N.W. 403 (Wisc. 1891) (“But it appears that the injury was inflicted in the school, after it had been called to order by the teacher, and after the regular exercises of the school had commenced. Under these circumstances, no implied license to do the act complained of existed, and such act was a violation of the order and decorum of the school, and necessarily unlawful. Hence we are of the opinion that, under the evidence and verdict, the action may be sustained.”). *Corfield v. Coryell*, 6 Fed. Cas. 546, 552 (C.C.E.D.Pa. 1823) (“Protection by the government”) and 42 U.S.C. § 1981(a) (“to the full and equal benefit of all laws and proceedings for the security of persons”).

I use my Constitutional Privileges, honors, and rights of knowing from my undergraduate and law school, juris doctor candidacy, educations, and political offices and from reading law outside of formal schooling for the writing and discussions, arguments, and motions of these filings, *see* Certification of Interest. *Hollingsworth v. Perry*, 133 S. Ct. 2652, 2667, 2670-72 (U.S. 2013) (“unique legal status”).

STATEMENT OF FACTS

In September 1992, I was born, in New Jersey, and my family and I lived there until the summer of 2000. In the spring of 1998, my parents, my younger brother, and I visit the United Kingdom and India. In 1999 or before moving to Indiana in 2000, my family and I visited the World Trade Center. In the summer of 2000, my family and I moved to Indiana. On September 11, 2001, when I was in the fourth grade, the terrorist attack on the World Trade Center happened. The term “War on Islam” is popularized, and the United States began the on-going Global War on Terror (“GWOT”).

- I. Somewhere in 2005 or 2006, a loud ringing sound played in both of my ears, and I lost some awareness of what was going on. During this happening, though, I

noticed I was in my room on my bed, and I saw a South Asian woman who was dressed in pants and a t-shirt sitting on my bedroom desk chair. I knew that she was a terrorist. I, later, realized that I had seen her earlier on the family room television, while she was dressed up as a Hindu god. This was not regular TV programming over satellite, but a TV-hack. I soon realized that she had laced me a psycho-bio-tech in my skull. In the alternative, she was trying to give me an antidote to counter a previous infection of a psycho-bio-tech weapon. I know when the stress weapon is engaged because it makes sound, or I get a shockwave or lash from the communication. When the President of the United States or another honorable or excellent is about to say my word patterns, I get sound bite message or notification in my ear or my attention is suddenly directed to turn on the television or social media and there is no shockwave or lash, but are rather healing. By the President of the United States repeating my word patterns, I know they have the same data as the terrorist; hence, the United States is/ was observing.

- II. During the 7th or 8th grade, during course registration for the next year, a classmate randomly came up to me in the hallways on my middle school and repeated a verbatim word pattern from a previous conversation I said at home, which immediately stressed me out. I do not know if a person has free will in saying the words or if they are made to say it, as the weapon can control bodily movements. *See* paragraph LVII.
- III. In the summer of 2006, before the freshman year of high school, I visited India for six (6) weeks.
- IV. From the moment described in paragraph II and onward, at sporadic moments, teachers, fellow students, professors, or television news anchors would repeat my word patterns. These verbatim word patterns trigger the weapon to induce severe

stress. The magnitude of the stress increases in 2013, increases again in 2014, and increases again in 2017.

- V. Before entering high school and while T.H., T.H., T.H. (T.E.) George W. Bush was President of the United States⁷, I started making pornography videos of myself and posted them on social media for about a year and half. I used the videos to combat the stressors, to ensure that I would not be forced to leave school.⁸ I also used my videos to display my fitness transformation.
- VI. In the ninth grade, I asked one of my classmates why our English classroom teacher said the word pattern at the beginning of the class. The classmate said, "I don't know." The next day the classmates told me that he was "activated" and that once I am done losing weight, I am going to gain it back. In addition, after college, I will gain a bunch of fat mass and but not enough weight to cause excessive skin. He also said that there was no stopping it. The classmate added that I would receive a minimum of "\$1 per American" for my "adversity" for having to live under the stress weapon.
 - A. I said, "that is about \$300M." (Now, over \$328M).
 - B. Then, the classmate said, "yeah."

7. The President of the United States is styled "T.H." in domestic affairs and "T.E." in foreign affairs. As the Federalist and anti-Federalist put it, the President is no King. *Arthrex, Inc.*, No. 19-1434 at p. 23, 594 U.S. ____ (2021) (Roberts, C.J., The Constitutional hierarchy requires "the exercise of executive power [to remain] accountable to the people.") (The Excellent's are closer to the people in the United States). Without the Treaty of Paris (1783), the President of the United States would be styled "Her Majesty's Honorable President of the United States" (in domestic affairs) and "Her Majesty's Excellent President of the United States" (in foreign affairs), and I would always carry the styles "Her Majesty's Excellent Student Body President of B.C.S.C." and "Her Majesty's Excellent Student Body President of Emory University, Inc." U.S. const. art. VI, § 1. *See also infra*, note 12.

8. A similar psycho-bio stress technology is used to change involuntarily someone's sexual orientation. *See* Christy Mallory, Taylor N.T. Brown, Kerith J. Conron, *Conversion Therapy and LGBT Youth Update*, UCLA School of Law Williams Institute, <https://williamsinstitute.law.ucla.edu/wp-content/uploads/Conversion-Therapy-Update-Jun-2019.pdf> (Accessed Aug. 18, 2021).

- C. I told him about the person in paragraph I, and I added that, even though she is Indian, she could be working for another race- or color-based terrorist organization to stop me from going to one of the best universities.
 - D. Then, he said that we will have this conversation “again another time.”
 - E. One other classmate witnessed the conversation.
 - F. I did not offer the classmate any money, unlike in paragraph IX because I was surprised by the conversation, and I did not know that I could.
 - G. I reserved the thought that I had already contacted the President of the United States (who I assumed would use the Federal Bureau of Investigations (“F.B.I.”)) and the Central Intelligence Agency (“C.I.A.”) about the tech-surveillance / eavesdropping to induce the stress.
- VII. During my freshman year, I also become a sole proprietorship, upon declaration, with a conglomerate structure.
- VIII. During my sophomore year of high school, I asked one of my classmates, who would later become the class president, R.E.C., IV, for both our junior year and senior year, to observe the triggering of a stress weapon by our business classroom teacher. I also told him about the conversation in paragraph VI, and I disclosed the name of the classmate in paragraph VI. The classmate said he would speak to the classmate in paragraph VI, and he would be able to “help.”
- IX. Then, the classmate from paragraph VIII, in our business-elective classroom, asked me a series of questions, but he stated that he was “activated” to turn off my stress.
- A. At this moment, I said the stress, depression, or another induced mental disability was to prevent me from becoming the President of the United States, reflecting on what was going on Pakistan (of the British *Raj*) to the now-late, now-assassinated Benazir Bhutto, and going to the Ivy League

undergraduate institutions by deflating my grades and test scores and my even sabotaging my legal career, all of which would prevent me from being rich or having \$100M or more before becoming President of the United States, which was interestingly already the sum of damages by the stress weapon accrued by this time, as I told him.⁹

B. The classmate said the classmate from paragraph VI said I was going to have more than \$100M.

1. I said, "I didn't know" he told you about that part.
2. As this classmate and I are closer friends than the classmate mentioned in paragraph VI, he said, "where was I?"
3. I said, "we did not have class together" that year.
4. Then, he said, "okay, let me help you know...it means I am going to give you money now."
5. A witness classmate who is also the person who sat next to me at my assigned sit and a study buddy said, "more than \$100M!"
6. Then, another witness who is an upper classman (a senior) and who sits next to this classmate at their assigned sits exciting said, "more than [G. H.]," who was our high school schoolmate (a senior) and was yet to become a National Basketball Association (N.B.A.) basketball player. ([G.H.] is currently worth over \$220M.).

9. Stream of Commerce/Supply-Chain Theory can be understood: (A) middle school to high school, high school to college, college to law school, law school to law firm, law firm to appointment, election, and/or \$100M+, and (B) Grades and/or SAT and/or ACT to college, college to grades and LSAT, and grades and LSAT to law school, law school to law school grades, law school grades to appointment, election, and/or income \$750M+. *Asahi*, 480 U.S. at 102 and *World-Wide Volkswagen Corp. v. Woodson*, 444 U.S. 286 (1980). The amount of money goes up after my performance at Emory University and the University of Notre Dame Law School, including the current-deflated grades.

7. Then, the classmate said, while pointing his pencil at me, “you will have at least \$100M and more money than [G. H].”
8. I said, “okay,” as I already know that, “but I still want at least \$1 per American, and I want to be the richest from B-C-S-C.”
9. He said, “okay, you will be.” The classmate witnesses, J.B., A.M., and R.L, nodded.

C. Then, I returned to the inquiry about observing our business school teacher using the stress weapon and how the classmate from paragraph VI was also a witness of our English teacher using the stress weapon. I also told him that I am a victim of terrorism, as mentioned in paragraph I, and that my parents could have hired the terrorist to make me join their hotel-motel business after college, but I told him that I doubt that they would do that.¹⁰

1. I also told him, in the alternative, the female dressed as a Hindu Goddess could be trying to cure of me of any mental disability induced by a White, Black, Arabic, Hispanic, etc. terrorist. *See supra*, note 5.
2. Yet, I added that I am guessing that only another Indian-American community member, especially my doppelganger, had to benefit from this battery, per college, law school, and employment standards.

10. Because of the organized domestic terroristic powers, including from the White nation, the Black nation, the East Indian nation, East Asian nation, etc., within our country, combating Untied States Power. U.S. const. VI, § 1 (“prior engagement”); Grievance 3, Decl. of Independence (1776); Definitive Treaty of Paris (1783); and Alien & Sedition Acts (1798). *See* Ex. E.

3. I also said that if the State of Indiana or the United States was doing this then they would wait until the last minute because a rational power would want to see how able I actually am.
4. Then, the classmate swiftly said, “we are not going to speak about that right now.”
5. Then, the classmate said the stress weapon will be turned off for the Advance Placement United States Government exam, which I received a 5 out of 5 in May 2010.¹¹

D. I also told him that the stress or depression was illegal and unconstitutional because it was battery and violated my freedoms. If anything, people would mistake me having the mental disability of obsessive-compulsive disorder (O.C.D.), as I was focused on my academic and career path and fitness. I added that I know this technology is under human “[absolute] control” because it can be lawlessly used on “royalty.”

E. I asked him to promise me that I would receive “money,” including for my “lost opportunities” and “what I have to go through,” for this constitutional violation in exchange for the United States “learn[ing]” how this technology works (as I knew the United States was observing and would continue to observe) and for “improving” lives (i.e. by letting someone have what I would have had but for this stress situation and giving me my damages and applying what the United States learns from my stress situation in aiding

11. The stress weapon was engaged throughout the times I took the PSAT, SAT, SAT subject tests, most AP tests, ACT, LSAT, and GMAT. When I took the GMAT test, a computer-based test, I remember the stress weapon changing thresholds in between the exam.

other stress-weapon victims). I mentioned that all money amounts are "after taxes."

1. The classmate said, "yes," so the stress/depression/"mental disab[ility]" technology would stay on but the stress weapon would be used only a few more times before it severally starts and that I would know it when it severally starts.
2. I also informed him that I want to do this to "uphold the United States Constitution," irrespective of the fact that I was then a member, not-officer of the high school's student council.
3. I asked him if I need to write anything down, although I know I would remember.
4. Then, he said, "no, we'll have the data."

F. I asked him if he would like 1/3 of the money recovered from the United States, and he said "yes" and that he knew he could "trust" me.

1. I told him that we each get a 1/3 for our contribution for this conversation and that I get an additional 1/3 because I will have to live this situation. Then, the to-be-class president classmate said, "I need a moment. Honestly, \$100M is a lot of money for me."
2. I quickly said, "no, it is not, but it is good to have. Bill Gates has a lot of money." I added, "the President can print the money," while Congress has the power of the purse, and "give it to me."
3. He said, "that is a good point."

G. He also said that a car will come in front of my house and play loud music which I already know once my mental disability starts.

- H. He also said that I would have the money “by the time I was 30 years old” and that I “can go to court before then.” I told him that I would sue, but I really did not want because it could delay me going to college or law school and because I really like learning and fashion I am aiming for the best, elite universities.
- I. He told me that I did not need law school to practice law. I said, I know because I would be an elected official if I became student government president in high school and anyone can also represent themselves.
- J. I also told him that the Treaty of Paris (1783)¹² is what American constitutional law comes down to, while referring to Section 1 of Article VI of the United States Constitution, and said its principles are being broken. I left open the possibility of getting representation from the White House directly in restoring the Constitutional protections.
- K. I also told him that I would major in political science over business, most likely, because political science was the science more on point for law.
- L. The classmate and I also agreed that I can “three times the money” in court and agreed again that I can “go to court before the age of 30 to collect the money” from the United States.
- M. I asked him if I would get fat still, and he said that he did not have time to overwrite that, as he was inactivated by this time.

12. The Definitive Treaty of Peace (Sept. 30, 1783) (See Yale L. Sch.’s Avalon Project, https://avalon.law.yale.edu/18th_century/paris.asp) (conditional transfer of sovereignty; “promote and secure to both perpetual peace and harmony”; King George III and his lawful successors remain The Absolute). Paris Peace Treaty – Cong. Proclamation of Jan. 14, 1784 (See Yale L. Sch.’s Avalon Project, https://avalon.law.yale.edu/18th_century/parispr2.asp) (every citizen should uphold the Treaty of Paris “sincerely, strictly, and completely”). See generally U.S. const. art. VI, § 1.

N. I said it is okay because if I become Student Body President, I would be immune to these technologies.

O. I asked him if President Bush knows by now, and he said, "I think so."

P. As three of our other classmates, J.B., A.M., and R.L., witnessed this dialogue:

1. The to-be-class president classmate asked, "what about them," as he pointed to the classmates with his pen or pencil.
2. I said, we will give them money too, setting an amount of \$40,000,000 each, after taxes.
3. And, we requested that these three classmates-witnesses not to repeat anything about this conversation yet and ready their memories for court, for the consideration of the agreement.
4. They nodded, and other classmates started walking into class.

Q. Right when class was going to start, I returned to my assigned seat. Once class started, quarter-size white lights in the shape of a circular rings or disks pierced through the glass window and tried to enter my classmate's person, but the teacher used his paper to smack the white rings/disks off route.

R. I saw the same white lights, which were dime-size, in the seventh grade in my social studies class; the rest of the time, I only saw quarter-size white rings/disks.

X. In 2008, the classmate mentioned in paragraph IX and I attended a Barack Obama for America rally in Indianapolis.

XI. On Inauguration Day 2009, T.H., T.H. Barack Obama is sworn into office of the United States Presidency to become T.H., T.H., T.H. (T.E.) Obama.

- XII. In April or May 2009, I was elected as the Student Body President of B.C.S.C. and the President of the Brownsburg High School student government.
- XIII. Additionally, during the 2009-2010 school year, when I was the Student Body President, I made a cartoon animation which inadvertently featured the female dressed as a Hindu god who I also thought was a terrorist from paragraph I. The animation was taken off of my school computer and U.S.B. thumb drive, which I still have, by same authority known by the United States and controlling this stress weapon.
- A. At the time of making the animation, I did not realize who she was.
 - B. But, as I describe in paragraph LI, while reflecting at the Emergency Detention Center of the St. Vincent Stress Center, I realized that it was the female dressed as a Hindu god who I also thought was a terrorist, mentioned in paragraph I, who had made it into the detailed animation. I remembered seeing her before high school, when she appeared on the family room television and then in-person in my bedroom.
 - C. I used Microsoft Powerpoint to make the animation slides.
- XIV. In 2010, the stress weapon was engaged again. I contacted the Obama White House through www.whitehouse.gov. On the contact page, I mentioned that I was the student government president and that I was under unlawful surveillance/eavesdropping, which was causing me stress and possibly interfering with my college applications. The next day, a faculty member of the Brownsburg High School came to my classroom to turn off the stress.
- XV. In August 2010, I enrolled at the Oxford College of Emory University, Inc. in Oxford, Georgia.

- XVI. In September 2010, I was elected as a senator with the most votes in the divisional student government for Oxford College of Emory University.
- XVII. In April 2011, I was disqualified for the candidacy of divisional presidency of Oxford College of Emory University for a flyer violation. The Oxford Senate refused to overturn my disqualification.
- XVIII. In May 2011, I started tracking my weight on an iPhone application.
- XIX. In September 2011, the Oxford Elections Board disqualified 18 freshman senators on the same precedent I was disqualified on.
- XX. In December 2011, I visited India again for a couple of weeks.
- XXI. In February 2012, my Oxford College classmate, now a lawyer, and I had the aforementioned precedent in paragraphs XVII and XIX overturned by the Constitutional Council of the Emory University Student Government Association.
- XXII. While waiting for a college shuttle, someone came up to me and injected me with a translucent liquid chemical. I did not notice anything as the stress weapon was not engaged.
- XXIII. In August 2012, I started school at Emory College of Emory University in Atlanta, Georgia.
- XXIV. In Spring of 2013, the stress weapon was engaged, and a professor used it on me while standing in front of the classroom. In April 2013, I won the election for the Emory University student government presidency, after an elections debate sponsored by Emory University's student newspaper.
- XXV. In April or May 2013, Ajay Nair, Ph.D., then-Senior Vice President and Dean of Campus of Life at Emory University, Inc. and supervisor of my student government advisor, at our first meeting after being sworn in as Emory University

student government president, used the stress weapon on me by saying random word pattern, [OMITTED], to me.

A. I responded, "Sorry? I don't know what you mean."

B. Then, Nair said, "it must be somebody else."

C. We continued seamlessly in the conversation.

D. At the end of this meeting, Nair asked me if he could have the contact information of my student government advisor from high school, and I gave him the contract information.

XXVI. During my senior year, when the Central Intelligence Agency (C.I.A.) was visiting Emory University for the university's career fair. I was called in for an interview, and the C.I.A. Officer said [OMITTED] to trigger the stress weapon while conducting my interview.

XXVII. In April 2014, while I was still student government president of Emory University, Inc., at our regular monthly meeting in Nair's office, Nair excitingly began a conversation with me by saying a word pattern, [OMITTED].

A. I felt the region above my right ear have two parallel wires pull back.

B. Then, my left ear started wiggling like I was receiving a message.

C. Nair said, "I am the F.B.I.," and I remembered Nair telling me at an earlier meeting that he is regular contact with F.B.I. Nonetheless, I assumed Nair might be working with the terrorist, mentioned in paragraph I, too, because he had used the stress weapon on me and was an Asian-American expert. But, as the conversation proceeded, I knew that Nair was working for the F.B.I. and updating me on what the stress weapon was going to do next. *See also* paragraph II.

D. I said, "oh."

E. Then, Nair said that I would gain a lot of weight and that I would start to become depressed and that I would have no choice to avoid it.

1. I said, as long as I get "\$1 million dollars per pound gained."
2. He said, "okay."
3. Then, I asked him, "how much weight?"
4. Then, Nair said, "it will be a surprise."
5. Then, I asked, "over 100 pounds?"
6. Then, he said, "easily."
7. Then, I said, "as long as nothing irreversible happens, then I'm okay with it."
8. I told Nair that the terrorists are taking this approach because I am "electable," odds they want to reduce or eliminate especially for the Presidency of the United States, and I will otherwise still be "well-off." I also said that the terrorist is doing this because I am "more fuckable" and "more likeable" than those at Harvard University. *See supra*, note 5.
9. I weighed 150 pounds and around 10% body fat. I said thank you and that my friend also promised me money, as I mentioned in paragraph IX, but neither I did not tell Nair about the conversation in paragraphs IX or VI nor did Nair bring up that conversation.

F. Nair called judges "mentally disabled, not smart."

1. I responded by saying that "anyone can be mentally disabled" and that it means that the person deviates, either side, from the standard, such as Facebook Founder Mark Zuckerberg.

2. Plus, I said that my parents and ancestors are legal immigrants; therefore, I am not likely to be mentally disabled (regressive), either genetically or socially. To clarify, I said, I am of “Indian descent” (India is the fattest country in the world). Ex. E.

G. Nair and I spoke about going to law school and that after taking a gap year, I would apply to the University of Notre Dame, which is located in my home state of Indiana, and other *U.S. News* Top Law Schools.

1. During this part of the conversation Nair also said, “you can do better than” Notre Dame.
2. I said I know and that I can easily get into Columbia University, but I will most likely go to a better Ivy League school, based on my at-home Law School Admissions Test administration, although I went to Notre Dame because of this stress weapon.
3. I also mentioned that the chairperson of one of my academic departments and thesis advisor suggested that I apply to graduate school for a Ph.D., but I was planning on attending law school for a J.D. first, even though I may apply for a Ph.D. or M.B.A. or another masters degree while in law school.

H. I told him that I have the highest level of testosterone and jokingly said it also at the “criminal level,” and I said it is because I workout and am happy. I said that it is also the leadership hormone in men, interestingly.

I. Then, while looking down and with a frown on his face, Nair said, people will start saying bits and “pieces of this conversation wherever you go. We can see everything you see and hear everything you can hear.” I did not tell him that this is how the stress weapon works and that he had used it on me

already, and we made no reference to our meeting described in paragraph XXV.

J. On my way out of his office, I asked him if I had anything to worry about, and he said “no.”

K. I did not tell Nair that I had contacted President Barack Obama via www.whitehouse.gov earlier that morning.

L. Royalty was brought up, including but not limited to stipulating the control and antidotes of this respective stress technology-weapon.

XXVIII. In May 2014, I graduated from Emory University with a Bachelor of Arts in Political Science and with Honors in Religion and with a cumulative grade point average of 3.718 out of 4.0.

A. I also authored an honors thesis in the Department of Religion, called “Weight Loss as a Religion,” and proposed a scientific method of racism in weight-loss politics.

B. The cumulative grade point average includes the grade deflation the stress weapon caused from almost every semester at Emory University.

XXIX. Around graduation and afterwards from Emory University, I noticed that President Obama used some of my word patterns from Emory University student government campaign debate, as described in paragraph XXIV, and House leadership used my quotes during press conference from my conversation with Nair.

XXX. Some of closest friends from Emory University, after we graduated together, seemed to be invited to be stressors, and they used verbatim word patterns from my conversation with Nair, as discussed in paragraph XXVII. I explained to them what was going on. And, for the first time, the stress weapon seemed to be

configured to auto, as the right side of my brain above my right ear felt like there is swirling, hurricane-pattern sound.

- XXXI. In the summer of 2014, I again contacted President Obama, addressing him as Commander-in-Chief and President, via www.whitehouse.gov and told him that this situation is going to affect my political career, my upcoming Law School Admissions Test, and my law school applications and admissions decisions, as he may remember from my previous contacts, and I updated him about conversation in paragraph XXVII, including the fact that I thought Nair was playing both sides.
- XXXII. A young South Asian woman, who was in her 20's and dressed in traditional South Asian grab, came to my house, and escorted me to my bedroom. She touched my right eye and told me go to sleep. Kartik father let her into the house. I think she was either a counter-witch or a counter-terrorist.
- XXXIII. In September 2014, around the time of my birthday, the classmate mentioned in paragraphs VIII and IX and I went out to eat at the local Buffalo Wild Wings. It was clear that the stress weapon was still engaged as he used it on me, repeating word patterns from my conversation with Nair in paragraph XXVII. I asked him why he said, and he told me "don't think about it too much."
- XXXIV. In October 2014, the terrorist mentioned in paragraph I appears again on the family room television again and send out white lights and rings from the television and entered my grandmother's eyes.
- A. The terrorist, mentioned in paragraph I, also said that she was here because someone had died and that she is going to kill someone in the next "seven years."
- B. Then, she asked, "is that Raj?" Then, she proceeds to answer her own question and says, "no, that can't be Raj. That's someone else."

C. Then, she played a parody or spoof scene depicting the *Ramayana*, the Hindu epic. As I was watching the scene, I realized that I had watched it before, as mentioned in paragraph I and that I had made an animation of her, as mentioned in paragraph XIII. I watched silently, except I asked my grandmother, “why do you watch this weird stuff?”

D. Once the scene was over, she said, “Raj, have fun in law school!” and that a ring can last “up to seven years.”

E. The white ring or disk made my grandmother say “go to sleep” in Gujarati, although it was the afternoon. I went upstairs and went to sleep.

XXXV. Sometime between January to April 2015, when I visited a United States Military recruiting for the Marines, I had met the qualifications, and I did not have the stress weapon used on me.

A. Yet, once the general walked in, on my way out, it seemed like he was trying to engage the stress weapon based on his facial expression.

B. I thought that the Military would add to my carry, as my resume and political attainments clearly show that I wish to be Commander-in-Chief of the United States Military, Armed Forces, and Space Force.

XXXVI. In or around May 2015, I received the Indiana Supreme Court Indiana Conference of Legal Education Opportunity scholarship to attend the University of Notre Dame Law School.

XXXVII. In August 2015, I enrolled at the University of Notre Dame Law School. Professor M.M. engaged the stress weapon on the first class of the first day of law school. Then, Professor Root engages the stress weapon on the same day by using verbatim word patterns from the conversation I had with Nair, as described in paragraph XXVII. During the second semester, Professor A.B. and the late

Professor J.N. engaged the stress weapon. Not much happens during the first year of law school, except it feels like the depression or stress weapon is still left on auto. My classmates would be able to serve as a witness.

XXXVIII. In 2016, candidate Donald J. Trump mentioned a few scenarios which made me suspicious of my privacy, including the use of my body language and word patterns. Once President Trump was sworn in, he spoke about inter-governmental *coup de tat* and domestic warfare, repeatedly.

XXXIX. In February or March 2016, Professor R. returned her Fall 2015 contracts course exam because of her pregnancy, which is either a two (2) or three (3) month delay from the University of Notre Dame Law School's grading policy, per its Hoynes Code.

XL. In the summer of 2016, I did not put in transfer applications to top law schools, including but not limited to Harvard Law School, despite my cumulative grade point average (G.P.A.) being in the safely in the 25th percentile or above, because of the stress weapon.

XLI. In or around August or September 2016, two of my second-year roommates used the stress weapon on multiple occasions, including the first time I met them. No other roommates to that date have used the stress weapon on me.

XLII. During the second year of law school, Professor O. engaged the stress weapon regularly by imitating word patterns from the conversation I had with Nair in paragraph XXVII.

XLIII. During the third year of law school, Professor R., Professor F., Professor Ma., and Professor P. regularly engaged the stress weapon, with Professor R. being the most aggressive at the beginning on the classroom, almost everyday. The other professor would use the word patterns within sentences, so it hard to spot them.

This time the word patterns would come from Keenan Hall, the all-male dormitory in which I was an assistant rector, or conversation I would have over the phone, either my voice call or text message, instead from paragraph XXVII.

- XLIV. From August or September 2017 to the time I take a voluntary separation of leave in good standing from the University of Notre Dame Law School, I contacted the White House, Department of Education, Department of Justice, and the F.B.I. about the happenings in the life, including the use of the psycho-bio-tech weapon which induces stress and the surveillance/eavesdropping; I also made about two visits to the F.B.I. office in South Bend, Indiana. During each visit with the F.B.I.-South Bend, it seemed like the agent was aware of the happenings.
- XLV. In September 2017, I was elected as the Notre Dame Law School Student Bar Association Representative to the Indiana State Bar Association.
- XLVI. In or around September 2017, I was asked to resign from Keenan Hall, but I got to keep my scholarship and grant benefits. I called Nair around this time, and I heard his phone receive a notification or text message. Then, Dr. Nair said a word pattern from one my law school classrooms. I then learned that my replacement was a fellow law student. The professors continue to use the stress weapon.
- XLVII. I e-mailed now-Honorable Justice Amy Barrett on her University of Notre Dame e-mail from my University of Notre Dame student e-mail, but I did not receive a response.
- XLVIII. On or around November 11, 2017, I took a voluntary separation of leave in good standing from the University of Notre Dame Law School, both the law school and the university administration approved my leave in good standing. I also resigned from my Notre Dame Law School Student Bar Association representative position.

I was also not subject to a refund as my tuition was covered by scholarships and grants.

XLIX. On or around December 7, 2017, I was put on emergency detention at the St. Vincent Stress Center in Indianapolis, Indiana for three days and charged with pointing a gun at another person by the Brownsburg Police Department in Brownsburg, Indiana.

- A. Charmi Patel, my dad's sister's daughter, and Nina Patel, my dad's sister and Charmi's mother, and Manisha Patel, my mother and Kartik's wife, were sleeping in master bedroom.
- B. Nina communicates with Kartik about pointing a gun or that I am threatening to kill myself.
- C. Kartik, my dad, calls the police from Indianapolis, where he was spending the night at his motel due to the occupancy in our house.
- D. Prior to being put on emergency detention several verbatim word patterns were said over CNN and Netflix.
- E. While in the St. Vincent Stress Center, the United States Military doctor for President Trump announces that President Trump's mental health is just fine, as I saw on CNN.
- F. I called Professor R. from the St. Vincent Stress Center to see if she could terminate these happenings.
- L. On or around December 20 and 21, 2017, I told Peter Horvath about my intentions to reapply to the University of Notre Dame Law School. Peter sent me the link to reapply. I filled out the application honestly, including the ongoing conviction about pointing a gun at another person. Peter writes to me, "At this point we want to let you know that you will not be readmitted to the University while this charge

is pending. Further, you will not be considered for readmission unless the pending criminal charge is favorably resolved.” He added, “Certainly you are welcome to keep us informed as the matter works toward resolution.”

- LI. Around Christmas 2018, I moved to my apartment on North Capitol Avenue in downtown Indianapolis, Indiana. In January 2018, I receive a supportive letter of re-admission to the University of Notre Dame Law School from a female medical professional who was either a physician assistant or nurse practitioner. I submitted this letter to the University of Notre Dame.
- LII. On April 30, 2018, the felony charge was dismissed. The police dispose of my gun.
- LIII. Around this time, I saw the white lights/rings/disks come out of my fourth-level apartment window and fly into my nostril; these set of white rings/disks also announced that “Notre Dame game you rings.” Another set of white lights/rings/disks flew out of my computer (MacBook Pro 15 inches) when I was Googling a military website. I also started hearing a drilling sound in my head and a high-pitch hummingbird sound, which faintly lasts to the date of the filing of this complaint. Then, two white lights/rings/disks flew out of my iPhone, from its charger plug-in area, while I was on Instagram. After these three sets of white rings/disks, I saw a white ring/disk come out of a computer screen while I was watching a famous soap opera on its network’s website.
 - A. The rings began inducing hunger into me and got me off my strict diet.
 - B. Immediately, I noticed that I had to curtail my exercising from 3.5 hours to 4 hours, the amount of time I can easily allocate to even during a full course load, to about 45 minutes.
 - C. I also heard cracking sounds and a compact disc shuffling sound inside my head.

- D. My eyes started flicker in the same marks as mentioned in paragraph XXXII.
- E. I felt a thin, hair-like wire go along my arm and leg bones, inside my body.
- F. Thus far, I have gained 187 pounds. I was 150 pounds and around 10% body fat when Nair told me what would happen. The unwanted weight gain has caused a change in the clothes (i.e. "religious grab") that I can wear and the brands.

LIV. I kept President Trump abreast about the happenings in this case at www.whitehouse.gov. I also re-informed President Trump, in his capacities as President of the United States and Commander-in-Chief, about my conversations detailing the contract with the United States with my classmates and Nair as mentioned in paragraphs VI, IX, XXXIII, and XXVII, the happenings in paragraph I and LV, and about my previous contacts with the White House; I also mentioned, for the first time, to T.H. (T.E.) Trump, that I made and starred in a few hand full of solo pornography videos while in middle school and high school, over the course of two years, as described in paragraph V. I asked T.H. (T.E.) Trump, if he would communicate back and show that he agrees to the contractual terms, and I told him that current total for damages are "from "750M to \$3 billion, to be multiplied by three."

- A. The next day or a few days later, President Trump sent me a signal through the television that he did agree to the contract too, after my attention was diverted to the television. President Trump displayed an "E," "yes," and "you" in sign language through the television, after he used my word patterns from my conversation with Nair as mentioned in paragraph XXVII, at a public rally. Then, I used www.whitehouse.gov to let President Trump know that I received his communication.

1. The “E” refers to “The Excellent,” which is my style and how I signed off my message to President and Commander-in-Chief Trump.
2. “Yes” to denote agreeing.
3. “You,” by pointing his finger, at me through the television.

B. President Trump used my word patterns once more at a campaign rally, and President Trump showed me his left ear. I followed up on www.whitehouse.gov.

LV. I was made to drive my car to the old Indianapolis airport, via the private roads, which I never take.

LVI. I visited the F.B.I. Indianapolis-HQ two times.

A. During both visits, I insisted that my situation was top-top secret, top-secret, confidential, or sensitive.

B. The agent triggered the stress weapon the first time. The female agent also offered to call the University of Notre Dame administration, which I agreed to.

C. The second time I met two officers who both denied knowing anything about my situation.

LVII. In 2018 and onward, I no longer met the requirements for the United States Military, because of the stress weapon, and I was denied recruitment.

LVIII. In summer of 2018, at the LifeTime Fitness by the F.B.I. Indianapolis-HQ, I saw the person mentioned in paragraph I; she approached the trainers there and “activated them.” She changed the sound of the psycho-bio-tech weapon, which played a hummingbird sound, to a loud-deep sound, although the effects only lasted for a week. Further, around this time, Policy Advisor Ivanka Trump’s Instagram story

was used to unlock the psycho-bio-tech weapon. My phone was locked for multiple days. Around this time, I spent one evening and afternoon at my Brownsburg, Indiana residence (*see* paragraph LI), and I saw these white lights/disks come in from my bedroom window and enter my dog's nose, as he was sleeping on his bed on the ground.

LIX. Starting from this time, a loud car comes by my Indianapolis downtown apartment to play a song from my pornography videos described in paragraph V, usually around 2:30am. The loud car does not come when I move into my mom and dad's home in Brownsburg. The car returns when I move into my housing at our family motel in Indianapolis, in March 2021.

LX. Then, I wrote to T.H. (T.E.) Trump to let him know that I am sorry about additional charges which I feel compelled to bring, in order to avoid claim or issue preclusion.

LXI. On August 23, 2018, the Superior Court of Hendricks County, Indiana granted me a protective order against Kartik Patel, my father and a naturalized United States citizen from India. *Patel, Raj v. Patel, Kartik*, No. 32D05-1808-PO-000372 (Ind. Super. Ct., Hendricks Cnty. Aug. 2018).¹³

LXII. In November 2018, I filed three (3) lawsuits, all of which were dismissed, in the Southern District Court of Indiana:

A. *Patel v. F.B.I. et al.*, No. 1:18-cv-03441-RLY-DML (S.D.I.N. Nov. 13, 2018),

B. *Patel v. F.B.I. et al.*, No. 1:18-cv-03442-WTL-DML (S.D.I.N. Nov. 13, 2018),

and

13. I sought the protective order for contacting me even though I asked him to stop. The protective order was issued, and, while seeking this protection order against Kartik Patel, I was able to avoid the stress weapon because I walked into the courthouse. Throughout the time the protection order was intact, contrary to what The Honorable judge ordered (standard form order), the stress weapon remained engaged. If Kartik's and other persons' presumptions of innocence are not overcome, then the United States is also responsible, as state court decisions are not binding on the United States. I, later, withdrew the protective order because I needed cash.

C. Patel v. F.B.I. et al., No. 1:18-cv-03443-TWP-MJD (S.D.I.N. Nov. 13, 2018).

- LXIII. In or around January 17, 2019, the felony charge was expunged.
- LXIV. In April 2019, I told T.H. (T.E.) Trump via www.whitehouse.gov that one of my Emory University classmates has become a billionaire and my damages exceed his net worth.
- LXV. On May 30, 2019, I flew into Seattle, Washington. At my hotel in Seattle, Washington, on 10th floor or so, a word pattern was thrown into the window, which I did not understand.
- LXVI. Beginning of June 2019, I visit San Diego for a three-day trip. Once I landed at the San Diego trip, the Uber Drive said a verbatim word pattern which activated my stress. And, while watching E! Network, the stress weapon was activated.
- LXVII. In mid-June 2019, I flew into Miami, Florida to take a three-day cruise. At the Miami Airport, my phone was giving me problems. The cruise was stress-weapon free.
- LXVIII. I applied for re-admission for Fall 2019, and I completed the application material for re-admissions. I was denied re-admissions upon the recommendation of the University of Notre Dame University Counseling Center, although the ultimate authority for re-admissions into the law school lies with the Notre Dame Law School itself.
- LXIX. In February 2020, I filed a lawsuit, which was dismissed, in the Southern District Court of Indiana: *Patel v. Trump et al.*, No. 1:20-cv-00454-SEB-DML (S.D.I.N. Feb. 19, 2020).
- LXX. In March 2020, I filed a lawsuit, which was dismissed, in the Southern District Court of Indiana: *Patel v. Trump et al.*, No. 1:20-cv-00758-RLY-MJD (S.D.I.N. Apr. 14, 2020).

- LXXI. For Spring 2020, I again re-applied for readmissions. I was again denied re-admissions upon recommendation by the University of Notre Dame University Counseling Center.
- LXXII. By this time, I had informed President Trump that I will permanently have excess skin from weight gain, if I do not stop gaining as soon as possible, and that I will need skin removal surgery which causes irreversible scarring. I was about 280 pounds.
- LXXIII. Around the beginning of the COVAID-19 pandemic, I started regularly residing back at my residence in Brownsburg, Indiana. *See* paragraph LI. Then, in April 20, 2020, my younger brother, Neal K. Patel, who is a student at the Georgetown Law Center, and I stayed at The Trump International Hotel in Washington, D.C. with the hopes of getting a meeting with President Trump. As I was speaking with my brother about asymptomatic patients or individuals with COVAID-19, the cable news anchor puts her finger on her ear bud and then asks the pundit, "Doctor, what about asymptomatic patients?" President Trump posted an Instagram photo displaying [OMITTED].
- LXXIV. For Fall 2020, I again re-applied for re-admissions. I was again denied re-admissions upon recommendation by the University of Notre Dame University Counseling Center.

A. Kevin O'Rear stated:

I also want to note that, if you choose to apply for readmission to Notre Dame Law School in the future, your application will be reviewed on the basis of all of the facts of which we are aware at the time. Readmission to the Law School is not guaranteed, although

whether you have filed litigation against the University will not, in and of itself, prevent you from being admitted.

We are, however, required to review each applicant's character and fitness to be admitted to the bar. We have received many messages from you in the past few years that are disturbing and which raise serious questions about your ability to pass a character and fitness review. I flag this so that you may (1) guide your behavior going forward and (2) be aware that the Law School may decide in the future that, based upon your conduct, including disturbing notes to University faculty and officials since your withdrawal, you are not eligible for readmission.

B. I responded by stating, "Why is this even a material consideration for re-admissions? Relationships with law school professors is not a part of application process. You're reprimanding me without trial by the Hoynes Code, which probably does not apply to the time I am not a law student. Further, it is retaliation for using my First Amendment rights." And, "per the law, I do not foresee any legal questions raised to pass a character and fitness test. *See* I.C. 35-38-9-10(b)(4)-(6), (d) & (e). In fact, I feel discriminated by your answer on my character and fitness." (Italics in original).

LXXV. On May 21, 2020, in the Southern District Court for New York, I filed a motion to intervene in a pending case against T.H. (T.E.) Trump, in his personal capacity: *Doe et al. v. The Trump Corp. et al.*, No. 1:18-cv-09936-LGS (S.D.N.Y. May 26, 2020), Dkt. 272 (subject matter found but denied intervention), *appeal denied* No. 20-1706 (2d Cir. October 9, 2020) *cert. denied*, *Patel v. Trump Corp.*, No. 20-1513 (U.S. June 14, 2021), *reh'r'g denied* (U.S. Aug. 2, 2021).

- LXXVI. In July 2020, Policy Advisor Donald Trump Jr. posted an Instagram post [OMITTED], and I move out of my downtown Indianapolis apartment.
- LXXVII. For Spring 2021, I again re-applied for re-admissions. I was again denied re-admissions upon the recommendation of the University of Notre Dame University Counseling Center.
- LXXVIII. I contacted the Biden-Harris Transition Team to update them about my situation.
- LXXIX. On Inauguration Day 2021, T.H., T.H. (T.E.) Biden is sworn in as the President of the United States to become T.H., T.H. (T.E.), T.H. (T.E.) Biden, and, as a part of his inaugural address, T.H., T.H. (T.E.), T.H. (T.E.) Biden stated that the People of the United States are in an “un-civil war,” eluding to the general climate inside the United States borders. T.H., T.H. (T.E.), T.H. (T.E.) Biden mentioned a word pattern from paragraph IX. I contacted the White House to inform them about the contract, mentioned in paragraphs VI, IX, XXXIII, XXVII and LVI, which I also assumed T.H., T.H. (T.E.), T.H. (T.E.) Biden already knew from his term in office as Vice President of the United States; I addressed T.H., T.H. (T.E.), T.H. (T.E.) Biden as President and Commander-in-Chief too, and I asked him for one more communication to ensure the contract, mentioned in paragraphs VI, IX, XXXIII, XXVII and LVI, for “\$750M to \$3.76B to be multiplied by three as treble monetary damages.”
- LXXX. President Biden copies body language and cough patterns during a press conference which I was led to watch.
- LXXXI. I applied to porn websites to be a model, and they told me to lose weight. I weighed 337lbs by this time.
- LXXXII. In July 2021, the loud car gave me my first asthma attack and caused my trachea to completely shut for a second. I woke up coughing. I developed bronchitis for

about two months. I have been living at my family's motel in Indianapolis since March 2021, as we are selling our Brownsburg, Indiana residence since my parents are building a bigger house in Greater Indianapolis. *See* paragraph LI.

LXXXIII. On August 2, 2021, the Supreme Court of the United States gives a decision on my petition for re-hearing dated June 15, 2021. *Patel v. Trump Corp.*, No. 20-1513 (U.S. Jun. 14, 2021), *reh'r'g denied* (U.S. Aug. 2, 2021).

LXXXIV. On August 14, 2021, at approximately 2:13PM EST, while looking at President Biden's photo on my Instagram Feed, I heard, on the left side of my brain above my left ear, through the C.D.M.A. (Code Division Multiple Access)- or G.S.M. (Global System for Mobiles)- enabled, skull-built-in seamless psycho-bio-technology, "The deal is, if you can get us into court, you get the money." The Instagram was from Fox News's account. Yet, at other times, White House verified accounts are also used to play messages.

LXXXV. For Fall 2021, I again re-applied for re-admissions. This time, I was permanently denied re-admissions upon recommendation by the University of Notre Dame University Counseling Center. Contrary to prior communications with Jake Baska and Dean Kevin O'Rear, who are both agents of the University of Notre Dame Law School, I was told that I may only apply for as a first-year student to the University of Notre Dame Law School, which would require me to re-take the Law School Admissions Test, and that re-admissions application would not be considered for Spring 2022.

LXXXVI. Some of the accessories/stressors in this situation were not fluent in the English language but could repeat my verbatim word patterns. In fact, throughout parts of America, many areas I visited are not-English-speaking. Grievance 20, Decl. of

Independence (1776) (not using the System of English Laws is a form of tyranny, i.e., not speaking the English Language) & U.S. const. art. VI, § 1.

LXXXVII. In addition, two (2) people have asked me to represent them as legal counsel, and I have not been able to represent them because I have not completed law school, as a result of the psycho-bio-tech stress weapon.

LXXXVIII. Most sadly, this has affected my Thinking and intellectual Freedoms; religiously speaking, my Hindu *rajyoga* and Indian-religion modern bodybuilding.

LXXXIX. In 2020, I was prescribed, but not diagnosed with a disease because of the technology factor, with various medications to counter the stress weapon's effects.

XC. On December 14, 2020, I took a lie detector test, to show that I am not making this up. *See* Exs. A-C.

XCI. The stress weapon remains operating, and the situation with the repeating of word patterns is also on-going.

XCII. On October 3, 2022, the Supreme Court denied certiorari. *TE TE Raj K. Patel v. United States*, No. 1:21-cv-02004-LAS (C.F.C. Nov. 5, 2021), Dkt. 10, *aff'd in part & rev'd in part*, No. 22-1131 (Fed. Cir. May 19, 2022), ECFs, 31, 40, 44, 46 & 48, *cert. denied*, No. 22-5280 (U.S. Oct. 3, 2022).

XCIII. Currently, I am about 406.9 pounds, unforeseeable and unagreed upon weight gain and after breach of contract.

XCIV. On June 27, 2021, I made a Religious Consciousness Complaint with the United States Department of Health and Human Services, Office of Civil Rights citing the happenings of religious violence, particularly of our Western and/or Indo-European type, in this complaint, which are also present in *Patel v. The Trump Corp.*, No. 20-1513 (U.S. June 14, 2021), *reh'r g denied* (U.S. Aug. 2, 2021). Receipt Number: 24886023. *See* Ex. D.

XCV. I am upper-caste, and as common knowledge holds, I cannot be mentally disabled without psychiatric intervention, and am immune to psychology. *See* Ex. E. 42 U.S.C. §§ 1981 *et seq.*

XCVI. This complaint to this court follows.

CLAIMS

All paragraphs from above are incorporated into this section. Each claim is independent, and CAUSATION can be attached to each claim. The dollar amounts are from the old complaint in No. 1:21-cv-2004-LAS (C.F.C. 2021), and they need to be adjusted for on-going hyperinflation. The \$3.76B is roughly equal to \$4.54M; *see infra* for details. But, crossing the 400 lbs mark, I believe the calculations should be re-calculated to \$6B.

Claims against Jane Doe shall be construed to be against John Doe, individually, and collectively, as well; each Doe is either singular or plural.

Each claim under Indiana law may also be construed under California law, including because I have visited there while being infected with Doe's weapon. Each claim may also construed under Georgia and Washington, D.C. law, as I have visited and lived there while being infected with Doe's weapon.

One. **Battery** - Jane Doe, possibly The Hindu Terrorist Goddess, has battered with an advanced psycho-tech weapon and is currently battering me with it, particularly by playing sounds and tones, including which induce hunger and control bodily movements.

a. Relief:

- i. Indiana Constitution and law.
- ii. Compensatory damages.

Two. **Privileges and/or Immunities Clause** - Doe is violating the upmost Privileges and Immunities, both sword and shield, to withstand battery and other crimes against my person.

a. Relief:

- i. Order of Specific Performance to terminate the weapon.
- ii. Compensatory damages.
- iii. Indiana Constitution and law.
- iv. 18 U.S.C. §§ 241 *et seq.* or 42 U.S.C. §§ 2000bb *et seq.*

Three. **Full Faith & Credit Clause** - Doe must be faithful to the Privileges & Immunities Clause, a duty all person have within the police powers of the United States,

a. Relief:

- i. Order of Specific Performance to terminate the weapon.
- ii. Compensatory damages.
- iii. Indiana Constitution and law.
- iv. 18 U.S.C. §§ 241 *et seq.* or 42 U.S.C. §§ 2000bb *et seq.*

Four. **Tortious interference with business transaction** – Doe interfered with my contract with the University of Notre Dame and Emory University when it allowed for a stress weapon to be repeatedly and continuously be used on me, including causing me be to denied re-admissions into the University of Notre Dame du Lac, now as a protected class of expunged felony dismissed charges, permanently. The weapon has also caused grade deflation and unwanted academic and social performance. I also had to unwanted time off from the University of Notre Dame because of the weapon caused by Doe.

a. *See generally* paragraphs.

b. Relief:

- i. Order of Specific Performance to terminate the weapon.
- ii. Compensatory damages.
- iii. Indiana Constitution and law.
- iv. 18 U.S.C. §§ 241 *et seq.* or 42 U.S.C. §§ 2000bb *et seq.*
- v. 28 U.S.C. §§ 1491(a)(1)-(2).

Five. **Breach of Contract** - I entered into a contract with Doe or Doe's agent, and Doe is responsible for seeing the fulfillment the contract. The contract is breached, in my opinion, or I have a right to now breach. Both 42 U.S.C. §§ 1981 *et seq.* and the Thirteenth Amendment both afford me this right to breach.

a. Relief:

- i. Order of Specific Performance to terminate the weapon.
- ii. Compensatory damages.
- iii. Indiana Constitution and law.
- iv. 18 U.S.C. §§ 241 *et seq.* or 42 U.S.C. §§ 2000bb *et seq.*
- v. 28 U.S.C. §§ 1491(a)(1)-(2).
- vi. 42 U.S.C. §§ 1981 *et seq.*

Six. **Anticipatory Breach of Contract** - Doe, or Doe's Agent, and I entered into a contract, and I need the terms of the contract as they see them, as a part of the covenant of good faith and fair dealing, so I can exercise my right or privilege to breach or sue.

a. Relief:

- i. Order of Specific Performance to terminate the weapon.
- ii. Compensatory damages.
- iii. Indiana Constitution and law.
- iv. 18 U.S.C. §§ 241 *et seq.* or 42 U.S.C. §§ 2000bb *et seq.*

v. 28 U.S.C. §§ 1491(a)(1)-(2).

vi. 42 U.S.C. §§ 1981 *et seq.*

Seven. **Constructive Contract** - Doe, or Doe's Agent, and I entered into a contract, and I need the terms of the contract as they see them, as a part of the covenant of good faith and fair dealing, so I can exercise my right or privilege to breach or sue.

a. Relief:

i. Order of Specific Performance to terminate the weapon.

ii. Compensatory damages.

iii. Indiana Constitution and law.

iv. 18 U.S.C. §§ 241 *et seq.* or 42 U.S.C. §§ 2000bb *et seq.*

v. 28 U.S.C. §§ 1491(a)(1)-(2).

vi. 42 U.S.C. §§ 1981 *et seq.*

Eight. **Qausi-Contract** - Doe, or Doe's Agent, and I entered into a contract, and I need the terms of the contract as they see them, as a part of the covenant of good faith and fair dealing, so I can exercise my right or privilege to breach or sue.

a. Relief:

i. Order of Specific Performance to terminate the weapon.

ii. Compensatory damages.

iii. Indiana Constitution and law.

iv. 18 U.S.C. §§ 241 *et seq.* or 42 U.S.C. §§ 2000bb *et seq.*

v. 28 U.S.C. §§ 1491(a)(1)-(2).

vi. 42 U.S.C. §§ 1981 *et seq.*

Nine. **Promissory Estoppel** - Doe, or Doe's Agent, and I entered into a contract, and I need the terms of the contract as they see them, as a part of the covenant of good faith and fair dealing, so I can exercise my right or privilege to breach or sue.

a. Relief:

- i. Order of Specific Performance to terminate the weapon.
- ii. Compensatory damages.
- iii. Indiana Constitution and law.
- iv. 18 U.S.C. §§ 241 *et seq.* or 42 U.S.C. §§ 2000bb *et seq.*
- v. 28 U.S.C. §§ 1491(a)(1)-(2).
- vi. 42 U.S.C. §§ 1981 *et seq.*

Ten. **Assault** - Doe has a weapon which causes the stress and it I do not know what will happen next, when the next lash or pain will be created, or other bodily harm.

a. Relief:

- i. Order of Specific Performance to terminate the weapon.
- ii. Compensatory damages.
- iii. Indiana Constitution and law.
- iv. 18 U.S.C. §§ 241 *et seq.* or 42 U.S.C. §§ 2000bb *et seq.*
- v. 28 U.S.C. §§ 1491(a)(1)-(2).
- vi. 42 U.S.C. §§ 1981 *et seq.*

Eleven. **Trespass** - Doe is constantly trespassing into my residences by leaving the person in me and even sending the weapon or a-part of it through the window.

a. Relief:

- i. Order of Specific Performance to terminate the weapon.
- ii. Compensatory damages.
- iii. Indiana Constitution and law.
- iv. 18 U.S.C. §§ 241 *et seq.* or 42 U.S.C. §§ 2000bb *et seq.*
- v. 28 U.S.C. §§ 1491(a)(1)-(2).
- vi. 42 U.S.C. §§ 1981 *et seq.*

Twelve. **Right to Freely Travel** - The weapon, which is superstitiously attached to my person, by Doe follows me even when I travel across state and national boundaries.

a. Relief:

- i. Order of Specific Performance to terminate the weapon.
- ii. Compensatory damages.
- iii. Indiana Constitution and law.
- iv. 18 U.S.C. §§ 241 *et seq.* or 42 U.S.C. §§ 2000bb *et seq.*
- v. 28 U.S.C. §§ 1491(a)(1)-(2).
- vi. 42 U.S.C. §§ 1981 *et seq.*

Thirteen. **Trespass to Chattel** - Doe has used my personal computer, cell phone, TV, and other previously owned technologies to induce this stress and operate the stress weapon.

a. Relief:

- i. Order of Specific Performance to terminate the weapon.
- ii. Compensatory damages.
- iii. Indiana Constitution and law.
- iv. 18 U.S.C. §§ 241 *et seq.* or 42 U.S.C. §§ 2000bb *et seq.*
- v. 28 U.S.C. §§ 1491(a)(1)-(2).
- vi. 42 U.S.C. §§ 1981 *et seq.*

Fourteen. **Conversion** - Doe has used my personal computer, cell phone, TV, and other previously owned technologies to induce this stress and operate the stress weapon.

a. Relief:

- i. Order of Specific Performance to terminate the weapon.

- ii. Compensatory damages.
- iii. Indiana Constitution and law.
- iv. 18 U.S.C. §§ 241 *et seq.* or 42 U.S.C. §§ 2000bb *et seq.*
- v. 28 U.S.C. §§ 1491(a)(1)-(2).
- vi. 42 U.S.C. §§ 1981 *et seq.*

Fifteen. **Invasion of Privacy - Seclusion** - Doe weapon is configured to my person and can take word patterns and eavesdrop on my conversation and even bodily movements.

- a. Relief:
 - i. Order of Specific Performance to terminate the weapon.
 - ii. Compensatory damages.
 - iii. Indiana Constitution and law.
 - iv. 18 U.S.C. §§ 241 *et seq.* or 42 U.S.C. §§ 2000bb *et seq.*
 - v. 28 U.S.C. §§ 1491(a)(1)-(2).
 - vi. 42 U.S.C. §§ 1981 *et seq.*

Sixteen. **Stalking** - Doe has not only attached the weapon but also operates wherever I go, and the weapon can be used to initiate physical contact, including by “sight” and “sound,” like battery and assault. The weapon might have a GPS or location tracker.

- a. Relief:
 - i. Order of Specific Performance to terminate the weapon.
 - ii. Compensatory damages.
 - iii. Indiana Constitution and law.
 - iv. 18 U.S.C. §§ 241 *et seq.* or 42 U.S.C. §§ 2000bb *et seq.*
 - v. 28 U.S.C. §§ 1491(a)(1)-(2).

vi. 42 U.S.C. §§ 1981 *et seq.*

Seventeen. **Extreme Emotional Distress** – Doe caused extreme emotional distress by leaving the weapon in me and unattended.

a. Relief:

i. Order of Specific Performance to terminate the weapon.

ii. Compensatory damages.

iii. Indiana Constitution and law.

iv. 18 U.S.C. §§ 241 *et seq.* or 42 U.S.C. §§ 2000bb *et seq.*

v. 28 U.S.C. §§ 1491(a)(1)-(2).

vi. 42 U.S.C. §§ 1981 *et seq.*

Eighteen. **Parasitic Damages** – Doe has caused additional damages to diseases and other medical conditions which I had, irrespective whether the weapon caused it or not, such as weight gain, grade deflation, and other unwanted or unforeseeable injuries by living life, including racial, social, classist, etc. remedial goals and acts applied against me already.

a. Relief:

i. Order of Specific Performance to terminate the weapon.

ii. Compensatory damages.

iii. Indiana Constitution and law.

iv. 18 U.S.C. §§ 241 *et seq.* or 42 U.S.C. §§ 2000bb *et seq.*

v. 28 U.S.C. §§ 1491(a)(1)-(2).

vi. 42 U.S.C. §§ 1981 *et seq.*

Nineteen. **Conspiracy** - Doe is possible a part of a larger group of unconstitutional operatives, and being superstitiously infected with Doe's weapon can trigger a reaction with other persons infected, who act as involuntary agents, by Doe's

weapon or Doe's affiliates or known likely weaponized reactions. The conspiracy attached with persons who have already enacted remedial goals, including racial, social, classist, etc., and acts applied against me already.

a. Relief:

- i. Order of Specific Performance to terminate the weapon.
- ii. Compensatory damages.
- iii. Indiana Constitution and law.
- iv. 18 U.S.C. §§ 241 *et seq.* or 42 U.S.C. §§ 2000bb *et seq.*
- v. 28 U.S.C. §§ 1491(a)(1)-(2).
- vi. 42 U.S.C. §§ 1981 *et seq.*

Twenty. **United States Civil R.I.C.O., 18 U.S.C. §§ 1961 *et seq.*** - Doe and Doe have infected me with their weapon, especially along with § 1951-52 as well, of assault and other crimes related to biological, chemical, and/or psychological weapons. Doe is an enterprise and last for at least over 14 years. The conspiracy attached with persons who have already enacted remedial goals, including racial, social, classist, etc., and acts applied against me already.

a. The court may also appoint a Racketeering Investigator, if that be proficient.

b. Relief:

- i. Order of Specific Performance to terminate the weapon.
- ii. Compensatory damages.
- iii. Indiana Constitution and law.
- iv. 18 U.S.C. §§ 241 *et seq.* or 42 U.S.C. §§ 2000bb *et seq.*
- v. 28 U.S.C. §§ 1491(a)(1)-(2).
- vi. 42 U.S.C. §§ 1981 *et seq.*
- vii. 18 U.S.C. §§ 1964 *et seq.*

Twenty-one. **Indiana R.I.C.O., I.C. 35-45-6-1 *et seq.*** - Doe and Doe have infected me with their weapon, along with of assault and other crimes related to biological, chemical, and/or psychological weapons and crimes under IC 35-45-9, IC 35-47, IC 35-49-3, IC 35-43-5, IC 35-45-2-1, IC 35-44.1-1-1, IC 35-44.1-1-4, and IC 35-44.1-2-2. Doe is an enterprise and last for at least over 14 years. The conspiracy attached to person who have already enacted remedial goals against me.

a. Relief:

- i. Order of Specific Performance to terminate the weapon.
- ii. Compensatory damages.
- iii. Indiana Constitution and law.
- iv. 18 U.S.C. §§ 241 *et seq.* or 42 U.S.C. §§ 2000bb *et seq.*
- v. 28 U.S.C. §§ 1491(a)(1)-(2).
- vi. 42 U.S.C. §§ 1981 *et seq.*
- vii. 18 U.S.C. §§ 1964 *et seq.*

Twenty-two. **Indiana R.I.C.O. IC 34-24-2 *et seq.*** - The facts in this complaint against Doe allows for the prosecuting attorney to afford me relief. The conspiracy attached to person who have already enacted remedial goals against me.

a. Relief:

- i. Order of Specific Performance to terminate the weapon.
- ii. Compensatory damages.
- iii. Indiana Constitution and law.
- iv. 18 U.S.C. §§ 241 *et seq.* or 42 U.S.C. §§ 2000bb *et seq.*
- v. 28 U.S.C. §§ 1491(a)(1)-(2).
- vi. 42 U.S.C. §§ 1981 *et seq.*
- vii. 18 U.S.C. §§ 1964 *et seq.*

viii. I.C. 34-24-2-1 *et seq.*

If Doe is not responsible for the Weapon, but the Weapon can be neutralized or made less effective, then the following claim shall issue.

Twenty-three. **Order of Specific Performance** - Doe has the knowledge terminating, neutralizing, or making the weapon less effective, even if Doe is not responsible, and in order to use my constitutional Privileges and/or Immunities, especially since this weapon violates the Thirteenth Amendment's protections as well, this Court is entitled to order specific performance, in order to both serve and protect the Plaintiff, me. Under this claim, I am also able to provide reasonable compensation, through my parents or friends.

a. Relief:

- i. Order of Specific Performance to terminate the weapon.
- ii. Compensatory damages.
- iii. Indiana Constitution and law.
- iv. 18 U.S.C. §§ 241 *et seq.* or 42 U.S.C. §§ 2000bb *et seq.*
- v. 28 U.S.C. §§ 1491(a)(1)-(2).
- vi. 42 U.S.C. §§ 1981 *et seq.*
- vii. Indiana RFRA.
- viii. United States RFRA, 42 U.S.C. §§ 2000bb *et seq.*

Twenty-four. **Full Faith and Credit Clause** - *See* Twenty-three.

a. Relief:

- i. Order of Specific Performance to terminate the weapon.
- ii. Compensatory damages.

- iii. Indiana Constitution and law.
- iv. 18 U.S.C. §§ 241 *et seq.* or 42 U.S.C. §§ 2000bb *et seq.*
- v. 28 U.S.C. §§ 1491(a)(1)-(2).
- vi. 42 U.S.C. §§ 1981 *et seq.*
- vii. Indiana RFRA.
- viii. United States RFRA, 42 U.S.C. §§ 2000bb *et seq.*

Twenty-five. **Clauses Protecting Privileges and Immunities** - *See* Twenty-three.

- a. Relief:
 - i. Order of Specific Performance to terminate the weapon.
 - ii. Compensatory damages.
 - iii. Indiana Constitution and law.
 - iv. 18 U.S.C. §§ 241 *et seq.* or 42 U.S.C. §§ 2000bb *et seq.*
 - v. 28 U.S.C. §§ 1491(a)(1)-(2).
 - vi. 42 U.S.C. §§ 1981 *et seq.*
 - vii. Indiana RFRA.
 - viii. United States RFRA, 42 U.S.C. §§ 2000bb *et seq.*

The following claims are brought against Doe as if the United States is responsible.

Twenty-six. **Breach of Good Faith & Fair Dealing** - The United States breached the covenant of good faith and fair dealing by not allowing ensure that nothing permanent can happened to me and expedite the recovery process when the situation entered a stalemate. Possibly the United States breached good faith and fair dealing by not giving good faith and fair dealing to the earlier judicial processes.

- a. *See* Procedural History and Related Cases.

- b. Presidential Records Act, 44 U.S.C. §§ 2201–2209, will have allow us to access the necessary records.

‘twenty-seven.

Breach of Contract – The United States breached the contract it and I entered into about living under the stress weapon so the United States – and I – can learn about this terrorism and its goals, with my damages to be paid to me. This breach of contract includes breach of good faith and fair dealing.

- a. The contract was entered into under T.H., T.H., T.H. (T.E.) Bush’s presidency, as described in paragraphs VI and IX.
- b. Each President repeats my word patterns after making contact with them and asking them to communicate back.
- c. T.H., T.H., T.H. (T.E.) Obama verified the contract, while he was on the campaign trail, and throughout his terms as described in paragraphs XIV, XXVII(K), XXIX, and XXXI.
- d. T.H. (T.E.) Trump verifies the contract, as mentioned in paragraphs XL, LVI (especially sign language), LX, LXV, and LXXVIII. The contract is breached when I exceed the amount of weight when I would have excess skin from weight gain, as mentioned in paragraph LXXIV.
- e. T.H., T.H. (T.E.), T.H. (T.E.) Biden is sworn in and affirms the contract, after I contact him via www.whitehouse.gov, as mentioned in paragraphs LXXX, LXXXI, LXXXII, and LXXXVI.
- f. See Claim 1.
- g. Relief:
 - i. 28 U.S.C. §§ 1491(a)(1)-(2) – Damages are the amount of \$330M for violation of equal protection clause + \$187M weight gain + time for

weight to loss + grades and scores deflation + loss of attending certain universities + loss of not becoming a lawyer + extra skin from weight loss (irreversible) + living under the stress + living with parents + defamation + having to take time off of law school and college + loss of gain = \$3.76B.

ii. Promissory Estoppel.

Twenty-eight. **Quantum Meruit** - There is unjust enrichment of the contractual/employment-type obligations we entered into.

a. Relief:

- i. 28 U.S.C. §§ 1491(a)(1)-(2) – Damages are the amount of \$330M for violation of equal protection clause + \$187M weight gain + time for weight to loss + grades and scores deflation + loss of attending certain universities + loss of not becoming a lawyer + extra skin from weight loss (irreversible) + living under the stress + living with parents + defamation + having to take time off of law school and college + loss of gain = \$3.76B.

Twenty-nine. **Constructive Contract** - This Court can construct a contract from the facts here, if it does not find that a contract has been well-pleaded.

a. Relief:

- i. 28 U.S.C. §§ 1491(a)(1)-(2) – Damages are the amount of \$330M for violation of equal protection clause + \$187M weight gain + time for weight to loss + grades and scores deflation + loss of attending certain universities + loss of not becoming a lawyer + extra skin from weight loss (irreversible) + living under the stress + living with

parents + defamation + having to take time off of law school and college + loss of gain = \$3.76B.

Thirty. **Quasi-Contract** - There is a contract here and all recovery under contracts law should be allowed.

a. Relief:

i. 28 U.S.C. §§ 1491(a)(1)-(2) – Damages are the amount of \$330M for violation of equal protection clause + \$187M weight gain + time for weight to loss + grades and scores deflation + loss of attending certain universities + loss of not becoming a lawyer + extra skin from weight loss (irreversible) + living under the stress + living with parents + defamation + having to take time off of law school and college + loss of gain = \$3.76B.

Thirty-one. **Establishment of Religion** – The United States established religion when it omitted to protect me from the terrorist who was dressed as a Hindu god and made me live through tortious technology.

a. *See generally* paragraphs, especially paragraphs LV(A), (B), & (F), and XCI, and note 4.

b. Monroe Doctrine (1823) as extended to Her Majesty's Commonwealth of Nations – Great Britain and India (constituted as the "Sovereign Socialist Secular Democratic Republic") and

https://www.un.org/en/ga/search/view_doc.asp?symbol=S/PV.8452;

National Security Advisor John Bolton invoked the Monroe Doctrine in describing the Trump administration's policy in the Americas, saying "In this administration, we're not afraid to use the word Monroe Doctrine...It's been the objective of American presidents going back to [President] Ronald

Reagan to have a completely democratic hemisphere,”
<https://www.washingtonexaminer.com/news/john-bolton-were-not-afraid-to-use-the-word-monroe-doctrine>.

- i. United Kingdom’s Religion: Long Live The Queen!
- ii. India’s Religion: Long Live Mother India!
- c. The United States Constitution is itself a contract, e.g. by the governed and the government. *See generally* U.S. const. art. VI, § 1 & amend. I and Decl. of Indep. (1776).
- d. 42 U.S.C. § 2000bb–3 (“This chapter applies to all Federal law, and the implementation of that law, whether statutory or otherwise, and whether adopted before or after November 16, 1993.”).
- e. Relief:
 - i. 5 U.S.C. §§ 702 & 706.
 - ii. 42 U.S.C. §§ 1981 & 1983.
 - iii. 42 U.S.C. § 2000bb-1(c).
 - iv. 28 U.S.C. §§ 1491(a)(1)-(2).

Thirty-two. **42 U.S.C. § 2000bb-1 – The United States substantially burdened my right to be re-admitted to the University of Notre Dame Law School when it did not protect my right of Free Exercise of Religion and/or Expression by allowing agents of the United States or terrorists or other unconstitutional act to prevent me from exercising, attending school, and interfering with the religious-side of my physical brain by placing the stress weapon and stress noise there.**

- a. Paragraphs LXXXIII, LV(A), (B), & (F), and XCI and note 4.
- b. U.S. const. amend. I.
- c. Relief:

- i. 42 U.S.C. § 2000bb-1(c), and
- ii. 28 U.S.C. §§ 1491(a)(1)-(2) – Damages are the amount of \$330M for violation of equal protection clause + \$187M weight gain + time for weight to loss + grades and scores deflation + loss of attending certain universities + loss of not becoming a lawyer + extra skin from weight loss (irreversible) + living under the stress + living with parents + defamation + having to take time off of law school and college + loss of gain = \$3.76B.

Thirty-three. **President's Vested Powers – In my personal capacity, each President violated his oath of office when he did not preserve, protect, and defend the Constitution and its amendments, in my situation of peril.**

- a. *See generally* paragraphs.
- b. Constitution itself is a contract with the American people.
- c. The President's vested executive powers allowed each President to enter into the contract of interest and his oath requires that he preserve, protect and defend the Constitution of the United States, which includes its amendments, including Amendments I, IV, VIII, XIII, and XIV.
- d. The vested powers are conditional upon The Definitive Treaty of Paris (1783), the Congressional Proclamation Respecting the Treaty of Paris of 1783 (January 14, 1783), and U.S. const. art. VI, §1.
- e. *Arthrex, Inc.*, No. 19-1434 at p. 23, 594 U.S. ____ (2021) (the executive power is to remain accountable to the people).
- f. Relief:
 - i. 5 U.S.C. §§ 702 & 706.
 - ii. 28 U.S.C. §§ 1491(a)(1)-(2).

Thirty-four. **President's Vested Powers – In my official capacity (ies), each President violated his oath of office when he did not preserve, protect and defend the Constitution and its amendments, in my situation of peril, and thus did not faithfully execute the office of the United States Presidency.**

- a. *See generally* paragraphs.
- b. Constitution itself is a contract with the American people.
- c. The President's vested executive powers allowed each President to enter into the contract of interest and his oath requires that he preserve, protect and defend the Constitution of the United States, which includes its amendments.
- d. The vested powers are conditional upon The Definitive Treaty of Paris (1783), the Congressional Proclamation Respecting the Treaty of Paris of 1783 (January 14, 1783), and U.S. const. art. VI, §1.
- e. *Wood v. Moss*, No. 13-115, p. 5 & 16, 572 U.S. 744 (2014) orders that "substantive content" of the message, including political, is evaluated when there is a "security risk" of an elected or appointed official and that immunity applies for enforcement of limiting speech. *See also Rubin v. United States*, 525 U.S. 990, 990-991 (1998) (Breyer, J., dissenting from denial of certiorari) ("The physical security of [an honorable] has a special legal role to play in our constitutional system.").
- f. *Arthrex, Inc.*, No. 19-1434 at p. 23, 594 U.S. ____ (2021) (the executive power is to remain accountable to the people).
- g. Full Faith and Credit Clause, which gives me constitutional right not to be battered or immunity, and Oath of President's Office requires that the vested powers be used in a certain way.

h. Absolute sovereign immunity is not applicable to T.H. President of the United States to T.E. Student Body President T.E. Student Body President Raj Patel, as T.E. is precedent.

i. Relief:

i. 5 U.S.C. §§ 702 & 706.

ii. 28 U.S.C. §§ 1491(a)(1)-(2).

Thirty-five. **Take Care Clause – I detrimentally relied on each President taking care that the laws be faithfully executed, if there is no contract, and that I would be free from the stress weapon.**

a. *See generally* paragraphs.

b. Constitution is a social contract itself.

c. Constitution is a contract with each corporate office or body politic within the Lockean-Machiavelli set up.

d. U.S. const. amend. V-Due Process.

e. The Definitive Treaty of Paris (1783), the Congressional Proclamation Respecting the Treaty of Paris of 1783 (January 14, 1783), and U.S. const. art. VI, §1.

f. Relief:

i. 5 U.S.C. §§ 702 & 706.

ii. 28 U.S.C. §§ 1491(a)(1)-(2).

iii. Promissory Estoppel.

Thirty-six. **Preceding Clause – The United States violated Article VI, Section 1 of the United States Constitution when it did not protect me from the psycho-bio-tech stress-depression weapon and violated my inalienable right life, liberty, and the pursuit of happiness and breached security of peace and harmony.**

- a. *See generally* paragraphs, especially paragraphs XXVII, XLVI, LVIII, & LXIV.
- b. Article VI, § 1 of the United States Constitution refers to the Declaration of Indep. (1776), the Treaty of Paris (1783), the Congressional Proclamation Respecting the Treaty of Paris of 1783 (January 14, 1783), and other Founding Documents.
- c. I detrimentally relied on the President of the United States, the Department of Justice, the Federal Bureau of Investigations, and other departments and bureaus to restore my constitutional guarantee and let me live my life.
- d. Relief:
 - i. 5 U.S.C. §§ 702 & 706.
 - ii. 28 U.S.C. §§ 1491(a)(1)-(2).

Thirty-seven. **Privileges and/or Immunities Clause – The United States violated the privileges and immunities clause in the original constitution and the privileges and immunities clause in the 14th Amendment when it left me in peril or this situation after I attained my first student government presidency of the B.C.S.C. and thereafter as student government president of Emory University, Inc.**

- a. *See generally* paragraphs.
- b. As mentioned in Grievance 21, Decl. of Indep. (1776), the Treaty of Paris (1783), and U.S. const. art. VI, § 1, I have constitutional immunity as The Excellent and The Excellent from weapons of the United States. I also have the privilege of knowing what caused the peril.
- c. Grievance 21, Decl. of Indep. (1776) and U.S. const. art. VI, § 1 explain what the president's and executive's vested powers must be used for and what faithfully execute the office of the presidency means.

- d. *Slaughter-House Cases*, 83 U.S. (16 Wall.) 36, 71, and 77-78 (1873) (“the clause was interpreted to convey limited protection pertinent to a small minority of rights, such as the right to seek federal office”; privileges of other “butchers,” applied as well to students, student government presidents, and incumbent and former elected and appointed officials) (but privileges for elected or appointed officials who are not citizens of a state or the United States would not have the privileges of that office, i.e. executive privilege not applicable) (natural-born would have the precedent over naturalized for the same office).
- e. The Supreme Court, in *Corfield v. Coryell*, 6 F. Cas. 546 (1823), also states that the Privileges and Immunities Clause, United States Constitution Article IV, Section 2, Clause 2 also includes the “Protection by the government; the enjoyment of life and liberty, *with the right to acquire and possess property of every kind*, and to pursue and obtain happiness and safety; subject nevertheless to such restraints as the government may justly prescribe for the general good of the whole.” *Corfield v. Coryell*, 6 F. Cas. 546 (1823) (Washington, J.) (emphasis added) and U.S. const. art. IV, § 2, cl. 2 (“Privileges & Immunities Clause”); *see also* U.S. const. amend. XIV, § 1 (“Privileges or Immunities Clause”) and 42 U.S.C. §§ 1981-1983.
- f. On July 12, 1816, Thomas Jefferson said to Samuel Kercheval, also known as H. Tompkinson, the following, which advocates for remedying the use of psychological weapons, such as the stress weapon:
 - i. I am certainly not an advocate for frequent and untried changes in laws and constitutions. I think moderate imperfections had better be borne with; because, when once known, we accommodate ourselves

to them, and find practical means of correcting their ill effects. But I know also, that laws and institutions must go hand in hand with the progress of the human mind. As that becomes more developed, more enlightened, as new discoveries are made, new truths disclosed, and manners and opinions change with the change of circumstances, institutions must advance also, and keep pace with the times. We might as well require a man to wear still the coat which fitted him when a boy, as civilized society to remain ever under the regimen of their barbarous ancestors. Thomas Jefferson to Samuel Kercheval. *The Thomas Jefferson Papers at the Library of Congress*, Series 1: General Correspondence 1651 to 1827, Retrieved from the Library of Congress, <https://www.loc.gov/item/mtjbib022494/>.

g. Relief:

- i. 5 U.S.C. §§ 702 & 706.
- ii. 18 U.S.C. § 242.
- iii. 28 U.S.C. §§ 1491(a)(1)-(2).
- iv. 42 U.S.C. §§ 1981-1983.

Thirty-eight. **Equal Protection Clause – The United States violated the Equal Protection Clause in the Fifth Amendment Due Process Clause to reinstate its protection over me.**

- a. *See generally* paragraphs.
- b. *Bolling*, 347 U.S. at 497 cited in *Windsor*, 570 U.S. at 804 (discussing equal protection under the Fifth Amendment).
- c. U.S. const. amend. V.

i. Equality – I was treated not fairly differently in Fair Play of Due Process of each material moment in the supply chain.

ii. Equity – I earned the protection of the United States after attaining two political offices.

d. Relief:

i. 5 U.S.C. §§ 702 & 706.

ii. 28 U.S.C. §§ 1491(a)(1)-(2).

iii. 42 U.S.C. §§ 1981-1983.

Thirty-nine. **Right of Privacy – The United States violated my privacy when it searched and seized my word patterns and then disseminated those same word patterns.**

a. *See generally* paragraphs.

b. *Lange*, No. 20-18 at p 21, 594 U.S. at ____ (2021) (castle doctrine creates an impenetrable shield against others).

c. Relief:

i. 5 U.S.C. §§ 702 & 706.

ii. 28 U.S.C. §§ 1491(a)(1)-(2).

iii. 42 U.S.C. §§ 1981-1983.

Forty. **Taking – The United States took my property when it took my verbatim word patterns and used it in the speeches of elected officials and news anchors.**

a. *See generally* paragraphs, including, but not limited to, paragraph LXXV.

b. Nonetheless, my verbatim word patterns were taken from me, but if they were taken for public use, including but not limited to disciplinary or correctional efforts, I did not have “just compensation,” pursuant to the Fifth Amendment or the Fourteenth Amendment of the United States

Constitution. U.S. const. amend. V & XIV. Theft or taking also necessitates a breach of the Fourth Amendment. U.S. const. amend. IV.

- c. *See also United States v. Lee*, 106 U.S. 196, 220 (1882) (Miller, J.).
- d. Immunity is not applicable to Takings and each President's individual capacities.
- e. Relief:
 - i. U.S. const. amend. V. ("just compensation").
 - ii. 5 U.S.C. §§ 702 & 706.
 - iii. 18 U.S.C. § 242.
 - iv. 28 U.S.C. §§ 1491(a)(1)-(2).
 - v. 42 U.S.C. §§ 1981-1983.

Forty-one. **Full Faith and Credit Clause – The United States violated the Full Faith and Credit Clause when it left me in peril or this situation after I attained my first student government presidency of the B.C.S.C. and thereafter as student government president of Emory University, Inc., therefore, disrespecting my "public Act[s]," which are magistrate positions and give me the style of "The Excellent."**

- a. *See generally* paragraphs.
- b. This Clause gives me a constitutional right not to be battered or assaulted with taxpayer resources.
- c. I felt like that my rights as a co-leader from The Declaration of Indep. (U.S. 1776) (i.e. right to represent in a charter and freedom from interference in a charter) and my rights as a student from the Declaration of Indep. (1776) (i.e. right to be represented in a charter) were violated, which are

fundamentally essential for my “[S]afety and [H]appiness.” The Decl. of Indep. (U.S. 1776). U.S. const. art. VI, § 1.

- d. The Congressional Proclamation Respecting the Treaty of Paris of 1783 (January 14, 1783) (full faith should be given). U.S. const. art. VI, § 1.
- e. The President is contracted via the United States Constitution with each of these political positions to protect and defend. Hence, absolute sovereign immunity is not applicable to T.H. President of the United States to T.E. Student Body President T.E. Student Body President Raj Patel, as T.E. is precedent. Presidents of the United States Biden, Trump, Bush and Obama each waived immunity, just in case, applicable to happenings, through a detailed conversation with friend and then-to-be-Class President, and with communication through television with President Trump and President Biden. Contract Cl., U.S. const. Immunity is applicable in civil matters (acts but not inactions), not these criminal and civil-crime matters, and legislatively waived. *See also* 18 U.S.C. §§ 241-242 and 42 U.S.C. §§ 1981-1984 and 18 U.S.C. §§ 1346, 1951 & 1961. U.S. const. art. VI, § 1 and Grievance 21, Decl. of Indep. (1776). Counter weapons have also been unduly preempted. U.S. const. amend. II.

f. Relief:

- i. 5 U.S.C. §§ 702 & 706.
- ii. 28 U.S.C. §§ 1491(a)(1)-(2).
- iii. 42 U.S.C. §§ 1983.
- iv. 42 U.S.C. § 2000bb-1(c).

Forty-two. **Thirteenth Amendment – The United States allowed for slavery, despite me relying on the preexisting social contract, the United States Constitution, that**

the President or another officer of the United States would perform their constitutional contractual duty to free me from this on-going slavery.

- a. *See generally* paragraphs, especially paragraph LVII.
- b. “Slavery” in Merriam-Webster.com Dictionary (1828) (“submission to a dominating influence”).
- c. *See also* 42 U.S.C. §§ 1981(a)-(c) (“Equal rights under the law”), 1982 (“Property rights of citizens”) & 1983 (“Civil action for deprivation of rights”).
- d. *See also* 18 U.S.C. § 242.
- e. Relief:
 - i. 5 U.S.C. §§ 702 & 706.
 - ii. 18 U.S.C. § 2383.
 - iii. 28 U.S.C. §§ 1491(a)(1)-(2).
 - iv. 42 U.S.C. § 1983.
 - v. 42 U.S.C. § 2000bb-1(c).

Forty-three. **Due Process – The United States let my Fair Play in Commerce be violated while I was a student at B.C.S.C., Emory University, and the University of Notre Dame Law School, while sitting for my various standardized and admissions tests, and while I was partaking in other things preparing for the workforce.**

- a. *See generally* paragraphs.
- b. U.S. const. amend. V. & art. I, § 8.
- c. 42 U.S.C. §§ 2000a(c) & 2000a-2.
- d. Relief:
 - i. 5 U.S.C. §§ 702 & 706.
 - ii. 28 U.S.C. §§ 1491(a)(1)-(2).

iii. 42 U.S.C. § 1983.

Forty-four. **Treaty of Paris (1783) – The United States violated the Treaty of Paris by not protecting me with its conditionally transferred sovereignty to maintain peace and harmony in my environs.**

a. *See generally* paragraphs.

b. *See* U.S. const. art. VI, § 1.

c. Relief:

i. 5 U.S.C. §§ 702 & 706.

ii. 28 U.S.C. §§ 1491(a)(1)-(2).

iii. 42 U.S.C. § 1983.

Forty-five. **18 U.S.C. § 241 – The United States, its delegates, including teachers, faculty, and deans, and the Brownsburg Police Department conspired to “oppress” or “deprive” or “threaten” me of right of Free Exercise of Religion by causing unwanted changes in academic and physical and social performance.**

a. *See generally* paragraphs.

b. Conspiracy, overt act not required.

c. Relief:

i. 18 U.S.C. § 242.

ii. 42 U.S.C. § 2000bb-1(c), and

iii. 28 U.S.C. § 1491(a)(1)-(2).

Forty-six. **18 U.S.C. § 242 – The United States deprived me of my right of religious free exercise because of my pornography videos I made, which countered the stress weapon, taking support away from “boots on the ground.”**

a. *See generally* paragraphs.

b. Relief:

- i. 18 U.S.C. § 242.
- ii. 42 U.S.C. § 2000bb-1(c), and
- iii. 28 U.S.C. § 1491(a)(1)-(2).

Forty-seven. **18 U.S.C. § 247(a)(2) – The United States deprived me of my right of religious free exercise because of my pornography videos I made, which countered the stress weapon, taking support away from “boots on the ground.”**

- a. *See generally* paragraphs.
- b. Relief:
 - i. 18 U.S.C. § 242.
 - ii. 42 U.S.C. § 2000bb-1(c), and
 - iii. 28 U.S.C. § 1491(a)(1)-(2).

Forty-eight. **18 U.S.C. § 241 – The United States, its delegates, including teachers, faculty, and deans, and the Brownsburg Police Department conspired to “oppress” or “deprive” me of my privileges and immunities secured to me by the United States Constitution after attaining each of my political offices as student government president of the B.C.S.C. and Emory University, Inc.**

- a. *See generally* paragraphs.
- b. Conspiracy, overt act not required.
- c. Relief:
 - i. 18 U.S.C. § 241.
 - ii. 28 U.S.C. §§ 1491(a)(1)-(2).

Forty-nine. **18 U.S.C. § 247(a)(2) – The United States and The University of Notre Dame intentionally obstructed, by force, Plaintiff in the enjoyment of his free exercise of religious beliefs, or attempted to do so, by using the psycho-bio-tech weapon**

with white rings/disks which caused a significant change in physical exercising and dieting and professional commitment.

- a. *See generally* paragraphs, especially paragraph I, XXII, LV, XXVII(A)-(C), XCI, and XCII.
- b. *See supra*, note 4.
- c. Relief:
 - i. 18 U.S.C. § 247(d).
 - ii. 28 U.S.C. §§ 1491(a)(1)-(2).

Fifty. 18 U.S.C. § 1951 – The United States obstructed, delayed, or affected commerce by changing my commercial output by robbing or extorting me of my personal property right to attend specific colleges and law schools and committed physical violence towards me.

- a. *See generally* paragraphs.
- b. Conspiracy, overt act not required.
- c. Relief:
 - i. 18 U.S.C. § 1951(a).
 - ii. 28 U.S.C. §§ 1491(a)(1)-(2).

Fifty-one. 18 U.S.C. § 1951 – The United States obstructed, delayed, or affected commerce by changing my transcript, an article or commodity of commerce, by robbing or extorting or conspiring to rob or extort me of my personal property right to attend specific colleges and law schools and committed physical violence towards me.

- a. *See generally* paragraphs.
- b. Relief:
 - i. 18 U.S.C. § 1951(a).

ii. 28 U.S.C. §§ 1491(a)(1)-(2).

Fifty-two. **18 U.S.C. § 1951 – The United States obstructed, delayed, or affected commerce by robbing or extorting or conspiring to rob or extort me of my verbatim word patterns and inserting them into news anchors, movies, and soap operas.**

a. *See generally* paragraphs.

b. Relief:

i. 18 U.S.C. § 1951(a).

ii. 28 U.S.C. §§ 1491(a)(1)-(2).

Fifty-three. **18 U.S.C. § 1951 – The United States obstructed, delayed, or affected commerce by robbing or extorting or conspiring to rob or extort me of my verbatim word patterns related to COVAID-19 asymptomatic patients while at the Trump International Hotel.**

a. *See generally* paragraphs.

b. Relief:

i. 18 U.S.C. § 1951(a).

ii. 28 U.S.C. §§ 1491(a)(1)-(2).

Fifty-four. **18 U.S.C. § 1341-51 – The United States devised or intended to devise a scheme or artifice to defraud me of its protection by using signs, signals, pictures, and sound on internet wire and on cable television.**

a. *See generally* paragraphs.

b. Produced arbitrary undergraduate and law school admissions results because of this stress-weapon that is controlled by the United States intervened and lowered the merit on the application.

- c. The transfer of word / data can be happening through, including but limited to, beaming (e.g., satellite, radio, soundwaves, etc.) or wire (e.g. internet, telecommunications, etc.).
- d. No intention of freeing me of the terrorism.
- e. Relief:
 - i. 28 U.S.C. §§ 1491(a)(1)-(2).
 - ii. 18 U.S.C. §§ 1341 & 1343.

Fifty-five. **Tortious interference with business transaction – The United States interfered with my contract with the University of Notre Dame and Emory University when it allowed for a stress weapon to be repeatedly and continuously be used on me.**

- a. *See generally* paragraphs.
- b. Relief: 28 U.S.C. §§ 1491(a)(1)-(2).

Fifty-six. **42 U.S.C. § 9501(2)(A) – The United States recklessly violated the Mental Health Bill of Rights when it did not make sure that the State of Indiana was using the least restrictive means when putting individuals on emergency detention.**

- a. *See generally* paragraphs.
- b. Relief:
 - i. 18 U.S.C. § 242.
 - ii. 42 U.S.C. § 2000bb-1(c), and
 - iii. 28 U.S.C. §§ 1491(a)(1)-(2).

Fifty-seven. **42 U.S.C. § 1981 – In my personal capacity, the United States did not give me full and equal benefit of all laws and proceedings for the security of persons and property as is enjoyed by white citizens, and subject me to like punishment, pains, penalties, taxes, licenses, and exactions of every kind.**

- a. *See generally* paragraphs.
- b. Relief:
 - i. 18 U.S.C. § 242.
 - ii. 18 U.S.C. § 2383.
 - iii. 42 U.S.C. § 1983.
 - iv. 42 U.S.C. § 2000bb-1(c), and
 - v. 28 U.S.C. §§ 1491(a)(1)-(2).

Fifty-eight. **42 U.S.C. § 1981 – In my official capacity(ies), the United States did not give me full and equal benefit of all laws and proceedings for the security of persons and property as is enjoyed by white citizens, and subject me to like punishment, pains, penalties, taxes, licenses, and exactions of every kind.**

- a. *See generally* paragraphs.
- b. Relief:
 - i. 18 U.S.C. § 241.
 - ii. 42 U.S.C. § 1983.
 - iii. 42 U.S.C. § 2000bb-1(c), and
 - iv. 28 U.S.C. §§ 1491(a)(1)-(2).

Fifty-nine. **18 U.S.C. § 2441(d)(1) – The United States and the entity using the psycho-bio-tech stress weapon committed a war crime of torture by inducing mental pains, cruel or inhuman treatment, performing biological experiments, or intentionally causing serious bodily injury.**

- a. *See generally* paragraphs.
- b. Relief:
 - i. 18 U.S.C. § 2441(a).
 - ii. 28 U.S.C. §§ 1491(a)(1)-(2).

iii. 42 U.S.C. § 1983.

Sixty. **18 U.S.C. § 175 – The United States unlawfully retains a biological weapon (i.e. the psycho-bio-tech stress weapon) or conspired with another organization to same.**

a. *See generally* paragraphs, especially paragraphs, I, XXII, LV, XXVII(A)-(C), and XCII.

b. Relief:

i. 18 U.S.C. § 175(a).

ii. 28 U.S.C. §§ 1491(a)(1)-(2).

Sixty-one. **18 U.S.C. § 229 – The United States used a chemical weapon to the extent not permissible by law against me.**

a. *See generally* paragraphs, especially paragraph I, XXII, LV, XXVII(A)-(C), and XCII.

b. Relief:

i. 18 U.S.C. § 229A(a)-(b).

ii. 28 U.S.C. §§ 1491(a)(1)-(2).

Sixty-two. **18 U.S.C. § 1832 – The United States took and distributed my trade secrets, my word patterns, for political service intended in interstate commerce, including for my service as each student government president in B.C.S.C. and Emory University, Inc.**

a. *See generally* paragraphs.

b. Relief:

i. 18 U.S.C. § 1832(b).

ii. 28 U.S.C. §§ 1491(a)(1)-(2).

Sixty-three. **18 U.S.C. § 1961 – The United States is an aider and abettor in a R.I.C.O. conspiracy through extortion, honest services fraud, biological weapons, and chemical weapons.**

a. *See generally* paragraphs.

i. Extortion – 18 U.S.C. § 1961.

ii. Honest services fraud – 18 U.S.C. § 1343.

iii. Biological weapon – 18 U.S.C. § 175.

iv. Chemical weapon – 18 U.S.C. § 229.

b. *Asahi*, 480 U.S. at 102 (supply-chain terrorism and stream of commerce terrorism; transcripts; (fair) playing in Commerce). RICO takes form of extortion (i.e. threats with the use of biological weapon to quite school and/or political and/or law), wire fraud (beaming of communications and soundwaves) (18 U.S.C. § 1343), intimidating someone in Commerce (schools/transcripts) (18 U.S.C. § 1951), use of biological weapon (stress weapon/bio-tech brain wiring) (18 U.S.C. § 175), use of chemical weapon (18 U.S.C. § 229), and racketeering (18 U.S.C. § 1952).

c. RICO is evaluated under a distinct precedent, *H.J. Inc.*, 492 U.S. at 248-250 (citations omitted).

d. Relief:

i. 18 U.S.C. §§ 1963-64.

ii. 28 U.S.C. §§ 1491(a)(1)-(2).

Sixty-four. **18 U.S.C. §§ 1091(a)(3)-(5) – The United States conducted genocide against a substantial part, i.e. one elected official is a substantial part, of my respective national, ethnic, racial, or religious group.**

a. *See generally* paragraphs.

b. Relief:

i. 18 U.S.C. § 1091(b)(2).

ii. 28 U.S.C. §§ 1491(a)(1)-(2).

Sixty-five. **Extreme Emotional Distress – The United States caused extreme emotional distress by leaving me unattended of its constitutional protection.**

a. Overall, since November 2017, I have taken unplanned and unwanted time off of law school which unduly and unwantedly effects my career timeline and unjustly limits my career choices, which all also causes me extreme emotional distress

b. *See generally* paragraphs.

c. Relief: 28 U.S.C. §§ 1491(a)(1)-(2) - \$3.76B.

Sixty-six. **Promissory Estoppel – I detrimentally relied on the United States in upholding its contract with me when I used the method in approaching this situation.**

a. *See generally* paragraphs.

b. Relief: 28 U.S.C. §§ 1491(a)(1)-(2) - \$3.76B.

DEMAND FOR RELIEF

WHEREFORE, The Excellent, The Excellent Raj K. Patel, with the interest of upholding the contract with the United States and the Constitution, asks this Court of Federal Claims to enter judgement in his favor and grant either all or some of the following relief¹⁴:

1. Relief described in the claims section above.

14. *Loveladies Harbor, Inc. v. United States*, 27 F.3d 1545, 1554 (Fed. Cir. 1994) (*en banc*) (To recover against the government, a plaintiff must identify a “substantive right created by some money-mandating constitutional provision, statute or regulation that has been violated, or an express or implied contract with the United States.”).

2. Give respective orders to fulfill the statutory and constitutional obligations required to me, including but not limited to *writ of mandamus* and a *writ quo warranto*. 28 U.S.C. §§ 1491(a)(1)-(2). 28 U.S.C. §§ 1651. 18 U.S.C. §§ 1964-1968.
3. Enforcement and application of the privileges and immunities clauses and Full Faith and Credit Clauses. 28 U.S.C. §§ 1491(a)(1)-(2). 18 U.S.C. §§ 241 *et seq.* See generally *Arthrex, Inc.*, 594 U.S. ____ (2021).
4. Rectify academic information. 28 U.S.C. §§ 1491(a)(1)-(2). 18 U.S.C. §§ 1967.
5. Order Plaintiff into the law school of his choice, along with the order to require the law school to graduate Plaintiff with their J.D. degree. 28 U.S.C. §§ 1491(a)(1)-(2). See general reconstruction powers. *Brown v. Board of Education of Topeka II*, 349 U.S. 294 (1955) (courts may enforce school enrollment “with all deliberate speed.”).
6. Award earned damages totaling multibillions – **after taxes \$6,000,000,000.00** [\$3.76B¹⁵ (Nov. 2021 numbers, plus adjusted for inflation and interest and elonged lost time of enjoyment)] – solely based on the horizontal trickle effect, including stream of Commerce; steps of organized playing in Commerce, per the contract. 28 U.S.C. §§ 1491(a)(1)-(2). Due Process. Commerce Clauses. 18 U.S.C. §§ 1964-1968. U.S. const. amend. V.
7. General order to seize all unlawful force over me. 28 U.S.C. § 1491(a)(1)-(2). 28 U.S.C. §§ 1651.
8. Order Plaintiff back into the Notre Dame Law School to complete course of study for his J.D. candidacy, within the minimum time required, 1.2667 semesters. 28

15. The settlement agreed with the Presidents of the United States is over \$330M for the battery with the bio-tech stress weapon, plus \$1M per pound gained (187lbs gained from 150lbs, 337) which is \$187M + time to lose weight + \$1B for lose in career + \$1B for college and law school application discrimination and unduly lowering the merit + reputational damages, including, but not limited to, my legitimacy + other consequential damages. **\$4,544,703,655.35 after taxes.**

U.S.C. §§ 1491(a)(1)-(2) and *Brown II*, 349 U.S. at 294 (courts may enforce school enrollment “with all deliberate speed.”). *See also* 28 U.S.C. § 1631.

9. Briefing on the bio-tech weapon, including effects and risks on regressive human evolution of Plaintiff and Plaintiff’s descendent, as all adversity impacts human evolution, and medicine / weaponry for forward-evolution. The antidote would be top-top secret or under lesser security clearances. 28 U.S.C. §§ 1491(a)(1)-(2). Due Process.
10. Award value of contracted money. 28 U.S.C. §§ 1491(a)(1)-(2).
11. Re-distribution of advance weaponry to me, for Safety and Happiness, constitutionally. U.S. const. art. IV, §§ 1 & 2, cl. 1 & art. III, § 1.
12. Alternatively, construe this complaint as a motion for judicial review, and see if the \$40M witness pay is due for adjustment for hyperinflation per good faith and fair dealing.
13. Other remedies which the court might deem fit, including because of the attack on my celebrity. 28 U.S.C. §§ 1491(a)(1)-(2). 5 U.S.C. §§ 702 & 706. 18 U.S.C. §§ 1964-1968.

Respectfully submitted,



/s/ Raj K. Patel
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J.D. Candidate, Notre Dame L. Sch.

President/Student Body President, Student Gov't Ass'n of
Emory U., Inc. 2013-2014 (corporate sovereign 2013-
present)

Student Body President, Brownsburg Cmty. Sch.
Corp./President, Brownsburg High Sch. Student Gov't
2009-2010 (corporate sovereign 2009-present)

Rep. from the Notre Dame L. Sch. Student B. Ass'n to the Ind.
St. B. Ass'n 2017

Deputy Regional Director, Young Democrats of Am.-High
Sch. Caucus 2008-2009

Co-Founder & Vice Chair, Ind. High Sch. Democrats 2009-
2010

Vice President of Fin. (Indep.), Oxford C. Republicans of
Emory U., Inc. 2011-2012

EXHIBIT A

BMA

**Bud McCorkle and Associates
Investigative Consultant / Security Advisor
Voice Stress Analysis / Polygraph
1000 Main Street
Anderson, In 46016
765-621-0309
e mail-marvinmccorkle@aol.com**

Date: December 14, 2020

**To: Brenda McGinley
All IN Investigations
7007 Graham Road
Indianapolis, In. 46220**

**SUBJECT: RAJ K. PATEL
Re: Digital Voice Stress Analysis (exam)
Case #:18-1-430**

Attached is the written report gained from a conversation with RAJ PATEL prior to the DVSA (Digital Voice Stress Analysis) exam conducted on December 14, 2020.

Per request, we discussed the allegations of himself being tracked via brain implant(s), verbal bashings by numerous persons both civil and in the criminal profession.

Pre and Post interview, the results Raj (1). (Feels the FBI, CIA and other Law Enforcement agencies) are stalking him (2) Unknown professionals are jealous of him, preventing him from having a great future (3) Raj said these "unusual" actions started back as early as 8 years old., but became more active sometime between 2004-2006

Note: Raj had a list for review and to formulate questions-he mentioned that he is a Democrat, however this is not his cause for this exam.

**Professionally,
Marvin "Bud" McCorkle
President American Polygraph Voice Stress Association
President International Society of Stress Analysts**

BMA INVESTIGATIVE CONSULTANT

CONFIDENTIAL TRUTH VERIFICATION REPORT

Date: 12.14.2020

ARRANGEMENTS

On 12.14.2020 the SUBJECT-- RAJ K. PATEL _regarding an ALL-IN Investigations case # 18-1-430 did take a DVSA examination.

We discussed the request for the Truth Verification examination, SUBJECT was interviewed and submitted to the detection of deception examination. DVSA technique was utilized.

PURPOSE

The SUBJECT was interviewed and examined for the purpose of determining if he is or was being truthful that he was being prohibited from advancing his career and having a future due to his own feelings of surveillance and being tracked from object in his brain.

The SUBJECT was tested by using a 15 (fifteen) question Searching exam.

Procedure

Standardized truth verification procedure was exercised throughout the examination. The SUBJECT acknowledged the examination was taken freely and that he was in good health, other than being nervous. All questions were reviewed with SUBJECT to protect against outside issues and to ensure that only the incident(s) in question was relevant to the examination.

EXAM INFORMATION

SUBJECT was examined in a private room with the examiner, the SUBJECT, RAJ PATEL was instructed to respond with "ONLY" a Yes or No and sit still.

BMA Investigations presents enclosed information to the client at his or her specific request. This material is meant for the client and his / her legal representative internal use only. BMA makes no warranty of any kind. Client will assume all risk and liability resulting from the usage of said material.

BMA--P.3 Case # 18-1-430

CONCLUSION:

Based on case details by the SUBJECT, upon standardized chart criteria, subject displayed a numerous amount of General Nervous Tension, along w minor Deception on two question.

General Nervous Tension is caused by many different reasons, i.e stress, repeated accusations.

Test results indicating Deception when answering Relevant questions---#4 -# 8 # 10 and #15.
Questions 4 & 15 reflected—he did not want to be here.

SUMMARY: Raj shows he believes in his own mind that he is being tracked by numerous Govt agencies, his own father and his “cronies” and that somehow, he has or is being tracked by an “unknown” item in his head. He did say that he has tried to re-enroll back at Notre Dame in Emory and Yosnei Universities, but his psycho-therapeutic examination resulted in –one exam stating he was okay, on the second exam, they chose to deny his re enrollment. His exam does indicate, he actually feels what he is saying is true to him.

See question and answers asked:

Respectfully submitted
Marvin "Bud" McCorkle

Bud McCorkle

President APAVSA
President ISSA
Fellow ISSA

SUBJECT TESTED-- Raj K Patel----dob 09. [REDACTED] 1992, last four of SSN-[REDACTED]

EXHIBIT B

ESSENTIAL ELEMENTS OF INFORMATION

(EEI)—Searching Exam

Case #: All-in Investigations---18-1-430

Name: Raj K. Patel

Type Exam Searching Date/Time 12/14/2020. @ 1pm

Questions: _____

- | | |
|------------------------------------------------------------------------|-----|
| 1. Is your 1st name of Raj? | YES |
| No Deception Indicated | |
| 2. Have you ever use any illegal drugs except Marijuana? | NO |
| No Deception Indicated | |
| 3. Have you ever lied to the FBI, CIA or any Law Enforcement agency? | NO |
| General Nervous Tension --No Deception Indicated | |
| 4. Are you standing up? | NO |
| General Nervous Tension- Deception Indicated | |
| 5. Do you feel you're being stressed intentionally? | YES |
| No Deception Indicated | |
| 6. Do you feel Trump could stop your stress? | YES |
| No Deception Indicated | |
| 7. Is today Monday? | YES |
| No Deception Indicated | |
| 8. Do you feel an unknown source put technology in your head? | YES |
| Deception Indicated | |
| 9. Do you feel the government is stressing you out ? | YES |
| No Deception Indicated | |
| 10. Are you lying to me? | NO |
| Deception Indicated | |
| 11. Are you stressed now? | YES |
| No Deception Indicated | |
| 12. Do you feel Pres Trump has added to your stress? | YES |
| No Deception Indicated | |
| 13. Do you think drugs have added to your stress situation? | NO |
| No Deception Indicated | |
| 14. Do you feel your dad and his Asian cronies is causing your stress? | YES |
| No Deception Indicated | |

15. Have you told me the truth to all the questions asked today?

YES

Deception Indicated

.....

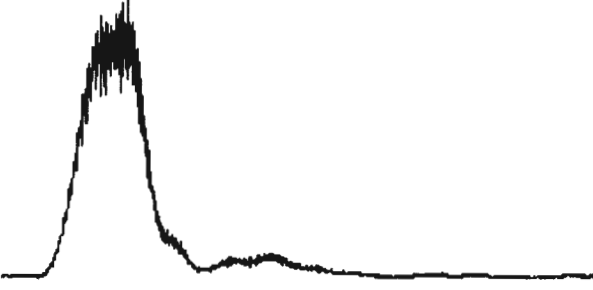
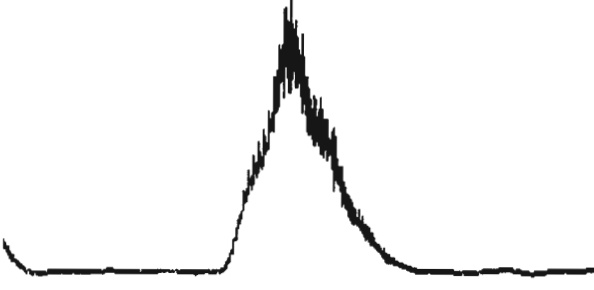
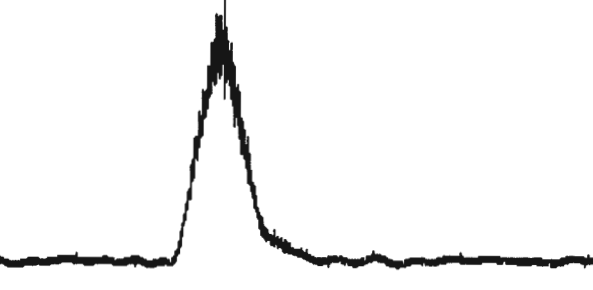
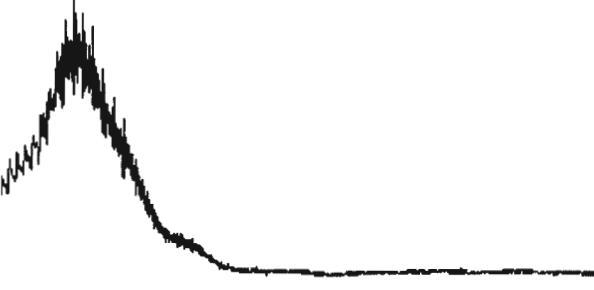
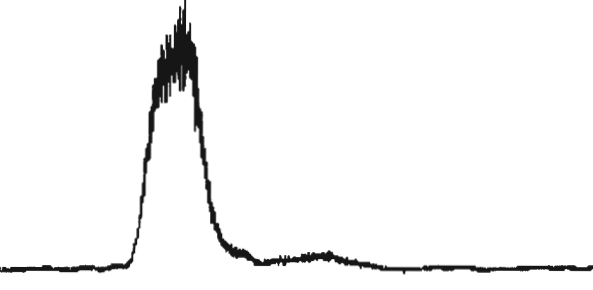
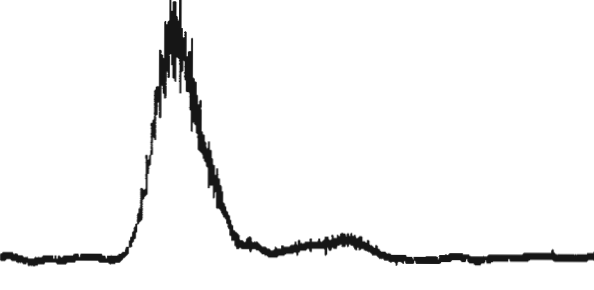
SUBJECT: RAJ K. PATEL-----DOB—09.1992, last four of SSN [REDACTED]

Examiner: *Marvin "Bud" McCorkle*, CSA #404

EXHIBIT C

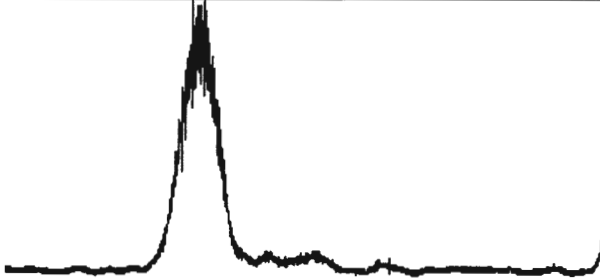
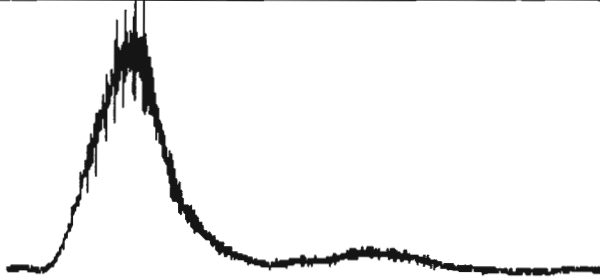
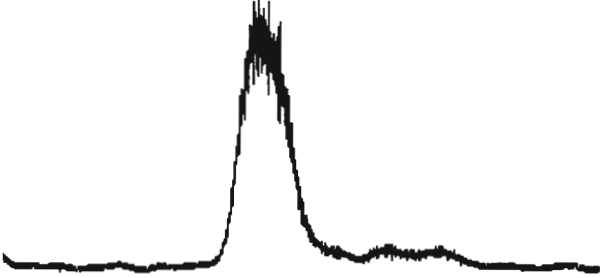
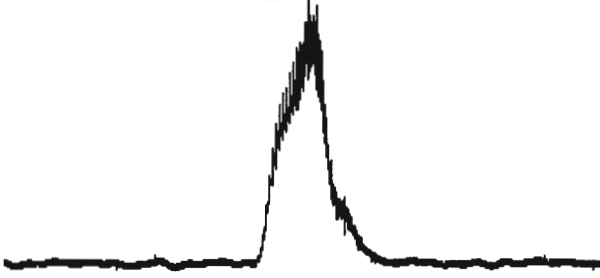
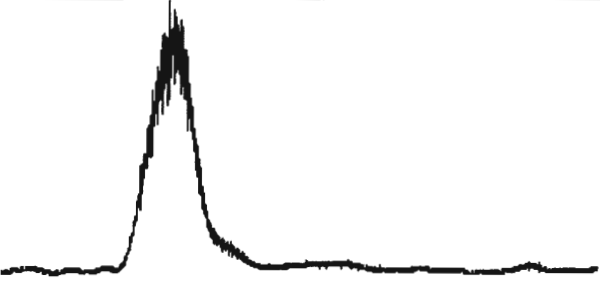
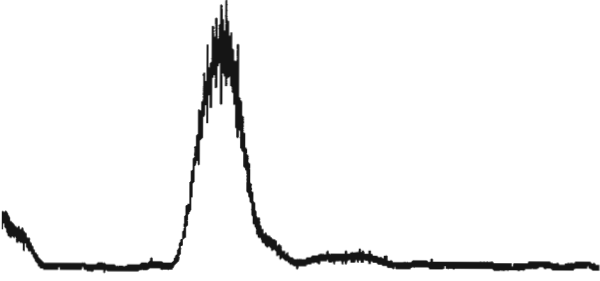
BMA Investigations

Exam Date : 12/14/2020 1:41:02 PM
 Examiner Name : Bud McCorkle
 Location : All-in
 Examinee Name : Raj K. Patel
 Case Type : Other
 Charge : NA
 Assigned ID : 75-1
 Test Protocol : NARRATIVE

 <p>Selection Number: 1 + (YES)</p> <p>Time Begin: 3.214 End: 4.12 Total: 0.906</p> <p>Question: 1. Is your 1st name Raj?</p>	 <p>Selection Number: 2 - (NO)</p> <p>Time Begin: 6.674 End: 7.581 Total: 0.907</p> <p>Question: 2. Have you ever used any illegal drugs except Marijuana?</p>
 <p>Selection Number: 3 - (NO)</p> <p>Time Begin: 11.536 End: 12.689 Total: 1.153</p> <p>Question: 3. Have you ever lied to the FBI, CIA or any Law Enforcement agency?</p>	 <p>Selection Number: 4 - (NO)</p> <p>Time Begin: 14.585 End: 15.161 Total: 0.576</p> <p>Question: 4. Are you standing?</p>
 <p>Selection Number: 5 + (YES)</p> <p>Time Begin: 18.128 End: 19.199 Total: 1.071</p>	 <p>Selection Number: 6 + (YES)</p> <p>Time Begin: 21.918 End: 22.907 Total: 0.989</p>

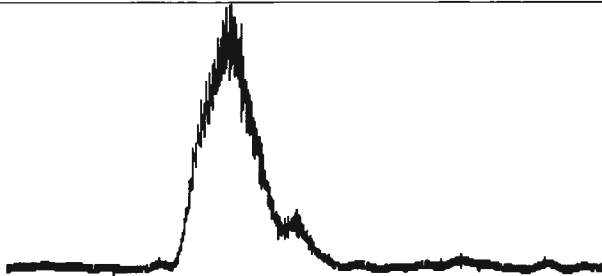
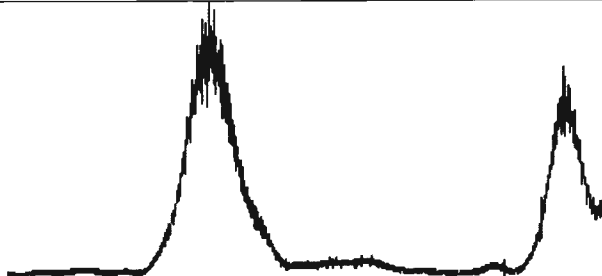
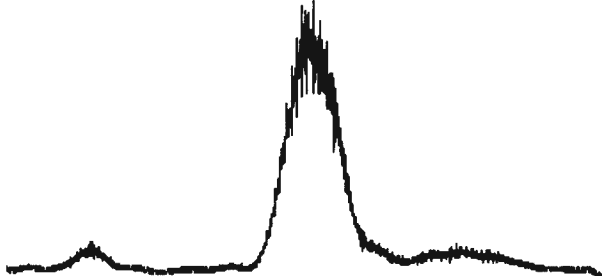


BMA Investigations

Exam Date : 12/14/2020 1:41:02 PM
 Examiner Name : Bud McCorkle
 Location : All-in
 Examinee Name : Raj K. Patel
 Case Type : Other
 Charge : NA
 Assigned ID : 75-1
 Test Protocol : NARRATIVE

<p>Question: 5. Do you feel you are being stressed intentionally?</p>  <p>Selection Number: 7 + (YES) Time Begin: 23.978 End: 25.379 Total: 1.401</p> <p>Question: 7. Is today Monday?</p>	<p>Question: 6 Do you feel Trump could stop your stress problems?</p>  <p>Selection Number: 8 + (YES) Time Begin: 28.428 End: 29.004 Total: 0.576</p> <p>Question: 8 Do you feel an unknown source put technology in your head?</p>
 <p>Selection Number: 9 + (YES) Time Begin: 31.394 End: 32.383 Total: 0.989</p> <p>Question: 9 Do you feel the federal govt is stressing you out?</p>	 <p>Selection Number: 10 - (NO) Time Begin: 34.196 End: 35.596 Total: 1.4</p> <p>Question: 10 Are you lying to me?</p>
	

BMA Investigations

Exam Date : 12/14/2020 1:41:02 PM
 Examiner Name : Bud McCorkle
 Location : All-in
 Examinee Name : Raj K. Patel
 Case Type : Other
 Charge : NA
 Assigned ID : 75-1
 Test Protocol : NARRATIVE

<p>Selection Number: 11 + (YES)</p> <p>Time Begin: 39.716 End: 40.623 Total: 0.907</p> <p>Question: 11. Are you stressed now?</p> 	<p>Selection Number: 12 + (YES)</p> <p>Time Begin: 43.177 End: 44.331 Total: 1.154</p> <p>Question: 12. Do you feel Pres Trump has added to your stress?</p> 
<p>Selection Number: 13 - (NO)</p> <p>Time Begin: 46.885 End: 48.039 Total: 1.154</p> <p>Question: 13. Do you think drugs has added to your stress situation?</p> 	<p>Selection Number: 14 + (YES)</p> <p>Time Begin: 51.664 End: 52.57 Total: 0.906</p> <p>Question: 14. Do you feel your dad and his Asian crownies is causing your stress?</p> 
<p>Selection Number: 15 + (YES)</p> <p>Time Begin: 54.054 End: 54.96 Total: 0.906</p> <p>Question: 15 Have you told me the truth today?</p> 	

Receipt Number: **24886023****EXHIBIT D**

Thank you for contacting the U.S. Department of Health and Human Services, Office for Civil Rights (OCR). OCR enforces federal civil rights laws which prohibit discrimination in the delivery of health and human services based on race, color, national origin, disability, age, sex, religion, and the exercise of conscience, and also enforces the Health Insurance Portability and Accountability Act (HIPAA) Privacy, Security and Breach Notification Rules.

We are in the process of reviewing your correspondence. We will complete our initial review as quickly as possible.

If you have questions about the novel coronavirus, COVID-19, please go to the Centers for Disease Control website at <https://www.cdc.gov>.

For additional information about OCR, including the complaint review process, and our HIPAA, civil rights, and conscience and religious freedom regulations, please see the following links:

<https://www.hhs.gov/ocr/complaints/index.html>

<https://www.hhs.gov/hipaa/index.html>

<https://www.hhs.gov/civil-rights/index.html>

<https://www.hhs.gov/conscience/index.html>

If you have any additional questions or need a reasonable accommodation, please contact OCR's Customer Response Center at 1-800-368-1019, Monday through Friday, 8:00 am to 6:00 pm, ET.

Sincerely,
Director, CCMO

English	If you speak a non-English language, call 1-800-368-1019 (TTY: 1-800-537-7697), and you will be connected to an interpreter who will assist you with this document at no cost.
Español - Spanish	Si usted habla español marque 1-800-368-1019 (o a la línea de teléfono por texto TTY 1-800-537-7697) y su llamada será conectada con un intérprete que le asistirá con este documento sin costo alguno.
中文 - Chinese	如果你讲中文，请拨打1-800-368-1019（打电话：1-800-537-7697），你将被连接到一位讲同语种的翻译员为你提供免费服务。
Tiếng Việt - Vietnamese	Nếu bạn nói tiếng Việt, xin gọi 1-800-368-1019 (TTY: 1-800-537-7697), và bạn sẽ được kết nối với một thông dịch viên, người này sẽ hỗ trợ bạn với tài liệu này miễn phí.
한국어 - Korean	한국어를 하시면 1-800-368-1019 (청각 장애용: 1-800-537-7697) 로 연락 주세요. 통역관과 연결해서 당신의 서류를 무료로 도와 드리겠습니다.
Tagalog (Filipino)	Kung ikaw ay nagsasalita nang Tagalog, tumawag sa 1-800-368-1019 (TTY: 1-800-537-7697) para makonek sa tagapagsalin na tutulong sa iyo sa dokumentong ito na walang bayad.
Русский - Russian	Если вы говорите по-русски, наберите 1-800-368-1019. Для клиентов с ограниченными слуховыми и речевыми возможностями: 1-800-537-7697), и вас соединят с русскоговорящим переводчиком, который вам поможет с этим документом безвозмездно.

* Your First Name: Raj * Your Last Name: Patel

Complainant Phones

Phone:	Phone Number	Usage
	(317) 450-6651	Home / Cell

Street Address Line 1:* 1239 Spring Lake Drive

Street Address Line 2:

* City: Brownsburg

* State:Indiana Country:USA * ZIP: 46112 Email Address (If available): raj@rajpatel.live

Are you filing this complaint for someone else?: No

*** I believe that I have been (or someone else has been) discriminated against on the basis of::**

- Religion / Conscience

Who or what agency or organization do you believe discriminated against you (or someone else)?

* Person or Agency/Organization?: Agency/Organization

Agency/Organization: University of Notre Dame Law School

* Street Address Line 1: Main Building

Street Address Line 2:

* City: Notre Dame

* State:Indiana Country:USA ZIP: 46556

Complainee Phones

Phone: **Phone Number Usage**
(574) 631-5000 Home / Cell

*** When do you believe that the civil right discrimination occurred?**

Violation Date

Date(s) **Violation Date**

Selected: 08/15/2015

11/11/2017

Describe briefly what happened. How and why do you believe that you have been (or someone else has been) discriminated against? Please be as specific as possible.. (Attach additional pages as needed)

The University of Notre Dame Law School, United States, Emory University, State of Georgia, State of Indiana, and other entities are violating my religious consciouness and preventing the Free Exercise of Religion. They induced a mental disability. FF John Adams called this method "difussing."

This situation started a long time while I was in high school. Religiously, I entered Emory University and majored in Political Science and Religion with Honors. My Honors was "Weight Loss as a Religion." They have induced depression, although the psychtrist feels otherwise, and obesity. These are acts of terrorism against me and First Lady Michelle Obama.

Please see Patel v. Biden, No. 21-cv-1076-TSC (D.D.C. 202_) and Patel v. Trump Corp., No. 20-1513 (U.S. 202_).

I will need enforcement from you all.

My website www.rajpatel.live has the attached documents. This religious battery or religious war on me has even affected my ability to fill out this complaint.

Filing a complaint with OCR is voluntary. However, without the information requested above, OCR may be unable to proceed with your complaint. We collect this information under authority of Section 1557 of the Affordable Care Act, Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Title IX of the Education Amendments of 1972, the Age Discrimination Act of 1975, Title II of the Americans with Disabilities Act and their implementing regulations. It is illegal for a recipient of Federal financial assistance from HHS to intimidate, threaten, coerce, discriminate or retaliate against you for filing a complaint or for taking any other action to enforce your rights under these Federal civil rights laws. OCR also collects information under authority of Section 1553 of the Affordable Care Act, the Church Amendments, the Coats-Snowe Amendment, the Weldon Amendment, the Religious Freedom Restoration Act, as well as other Federal civil rights, conscience protections and religious liberty statutes. It may also be illegal for a recipient of Federal financial assistance from HHS to intimidate, threaten, coerce, discriminate or retaliate against you for filing this complaint or for taking any other action to enforce your rights under these Federal laws. We will use the information you provide to determine if we have jurisdiction and, if so, how we will process your complaint. Information submitted on this form is treated confidentially and is protected under the provisions of the Privacy Act of 1974. Names or other identifying information about individuals are disclosed when it is necessary for investigation of possible discrimination, for internal systems operations, or for routine uses, which include disclosure of information outside the Department of Health and Human Services (HHS) for purposes associated with civil rights compliance and as permitted by law.

You are not required to use this form. You also may write a letter or submit a complaint electronically with the same information. To submit an electronic complaint, go to OCR's web site at: www.hhs.gov/civil-rights/filing-a-complaint/index.html or www.hhs.gov/conscience/complaints/index.html. To mail a complaint, please send to HHS Office for Civil Rights, Centralized Case Management Operations, 200 Independence Avenue, S.W., Suite 515F, HHH Building, Washington, D.C. 20201.

*** Signature:** AGREE: I have read, understand, and agree to the above.

Do you need special accommodations for OCR to communicate with you about this complaint?

No entries

If we cannot reach you directly, is there someone we can contact to help us reach you?

No entries

Have you filed your complaint anywhere else? If so, please provide the following . (Attach additional pages as needed)

	Person/Agency/Organization/Court Name	Date Filed	Case Number (If known)
Filed	Federal District Court Columbia	04/14/2021	21-cv-1076-TSC
Elsewheres:	Federal Southern District Court of New York	05/15/2020	1:18-cv-09936-LSG
	Second Circuit Court of Appeals	07/01/2020	20-1706
	Supreme Court of the United States	04/28/2021	20-1513

To help us better serve the public, please provide the following information for the person you believe was

discriminated against (you or the person on whose behalf you are filing).

Ethnicity: Not Hispanic or Latino

Race:

- Asian

Primary Language Spoken (if other than English):

How did you learn about the Office for Civil Rights?

- HHS Website/Internet Search
- Other (specify)

Please specify: Emory University

COMPLAINANT CONSENT FORM

The Department of Health and Human Services' (HHS) Office for Civil Rights (OCR) has the authority to collect and receive material and information about you, including personnel and medical records, when they are relevant to its investigation of your complaint.

To investigate your complaint, OCR may need to reveal your identity or identifying information about you to persons at the entity or agency under investigation or to other persons, agencies, or entities. In some circumstances, OCR may refer your complaint to another government agency, as warranted.

The Privacy Act of 1974 protects certain federal records that contain personally identifiable information about you and, with your consent, allows OCR to use your name or other personal information, if necessary, to investigate your complaint.

Consent is voluntary, and it is not always needed in order to investigate your complaint; however, failure to give consent is likely to impede the investigation of your complaint and may result in the closure of your case.

Additionally, OCR may disclose information, including medical records and other personal information, which it has gathered during the course of its investigation in order to comply with a request under the Freedom of Information Act (FOIA) and may refer your complaint to another appropriate agency.

Under FOIA, OCR may be required to release information regarding the investigation of your complaint; however, we will make every effort, as permitted by law, to protect information that identifies individuals or that, if released, could constitute a clearly unwarranted invasion of personal privacy.

OCR will use any applicable protections in that law to safeguard information which could identify you, or other individuals, or that, if released, could constitute a clearly unwarranted invasion of personal privacy. OCR may be required to release some information regarding the investigation of your complaint under the Freedom of Information Act (FOIA), however, information concerning your complaint which could reveal your identity is protected from disclosure to third party requesters under FOIA.

Please read and review the documents entitled, Notice to Complainants and Other Individuals Asked to Supply Information to the Office for Civil Rights (PDF) and Protecting Personal Informations in Complaint Investigations (PDF) for further information regarding how OCR may obtain, use, and disclose your information while investigating your complaint.

In order to expedite the investigation of your complaint if it is accepted by OCR, please read, sign, and return one copy of this consent form to OCR with your complaint. Please make one copy for your records.

- As a complainant, I understand that in the course of the investigation of my complaint it may become necessary for OCR to reveal my identity or identifying information about me to persons at the entity or agency under investigation or to other persons, agencies, or entities.
- I am also aware of the obligations of OCR to honor requests under the Freedom of Information Act (FOIA). I understand that it may be necessary for OCR to disclose general information which it has gathered as part of its investigation of my complaint, excluding personally identifiable information.
- In addition, I understand that, as a complainant, I may be covered by the Department of Health and Human Services' (HHS) regulations which protect any individual from being intimidated, threatened, coerced, retaliated against, or discriminated against because he/she has made a complaint, testified, assisted, or participated in any manner in any mediation, investigation, hearing, proceeding, or other part of HHS's investigation, conciliation, or enforcement process.

*** Consent Selection:**

CONSENT: I have read, understand, and agree to the above and give permission to OCR to reveal my identity or identifying information about me in my case file to persons at the entity or agency under investigation or to other relevant persons, agencies, or entities during any part of HHS' investigation, conciliation, or enforcement process.

Uploaded Files			
	File Name	Size (Byte)	File Type
File Uploaded:	Dkt 1.pdf	0	Complaint Description
	Dkt 5.pdf	0	Complaint Description
	Complaint 20-1513.pdf	0	Complaint Description
	Pet. for ReHearing No. 20-1513 PDF.pdf	0	Complaint Description
	Motion for Recuse PDF.pdf	0	Complaint Description

EXHIBIT E

Pemberton et al.

Page 15

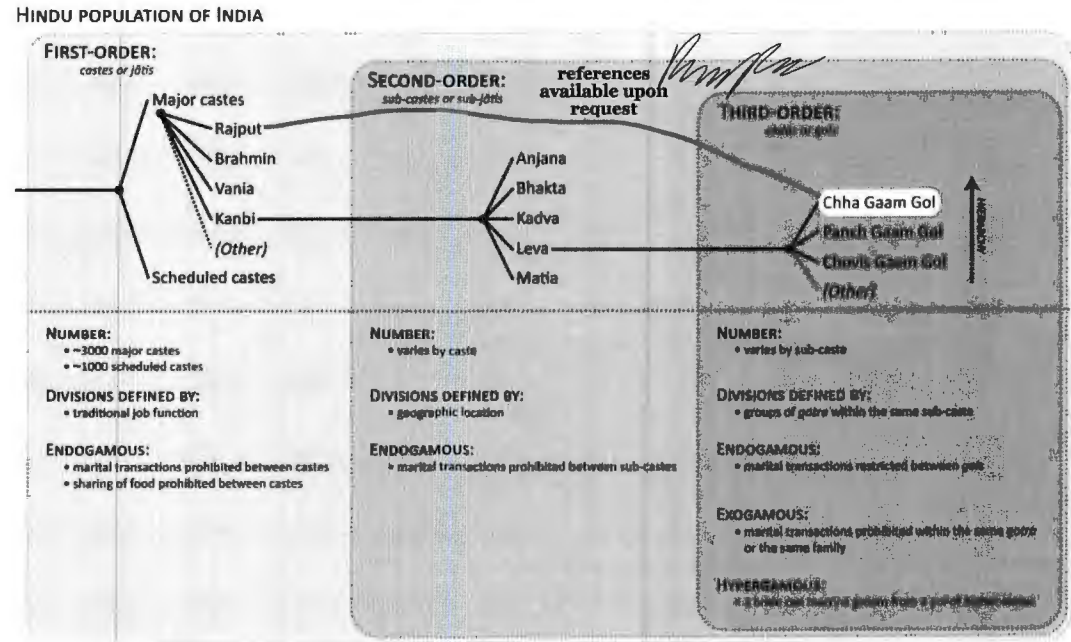


Figure 1. An overview of caste divisions in the Hindu population of India. The hierarchy among the top three Leva Kanbi Patidar *gols* was taken from Thakkar (Thakkar, 1999). We do not show the fourth and last order of caste divisions called *tads* (Shah, 1982), endogamous groups composed of a few families who are all members of the same *gol*. To the best of our knowledge, these “fourth-order” divisions do not exist among the Leva Kanbi Patidar.

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120 MONUMENT CIRCLE 107
INDIANAPOLIS IN 46204 **B2**

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CLERK OF COURT SDIN
46 EAST OHIO STREET,
RM.
INDIANAPOLIS, IN 46204
(317) 229-3700
Special Instructions: RAJ@0186@GMAIL.COM 3172293700

FX05899600900845899600900848



1 of 1 OTP # 018603ZT51 TRK # 589960090084
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0186-03ZT5-1

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